

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

[illegible]

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Homefire Prest Logs Ltd. 6925 Salashan Parkway Ferndale, Washington 98248	Entry Time/Date 10:45 AM/ 12/15/17	Permit Effective Date 01/02/15
	Exit Time/Date 1:25 PM/ 12/15/17	Permit Expiration Date 12/31/19
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Virginia Hermanson/Sales and Marketing/(360) 366-2200	Other Facility Data (e.g., SIC NAICS, and other descriptive information) SIC = 2499	
Name, Address of Responsible Official/Title/Phone and Fax Number Clayton Hermanson/Head of Operations/(360) 366-2200	Latitude: 48.894553 Longitude: -122.610779	
Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		



Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
● ● ● ● ● ●	● ● ● ● ●
● ● ● ● ● ●	● ● ● ● ● See the attached report for details.
● ● ● ● ● ●	● ● ● ● ●
● ● ● ● ● ●	● ● ● ● ●

Name(s) and Signature(s) of Inspector(s) Joseph Roberto 	Agency/Office/Phone and Fax Numbers EPA/OCE/(206) 553-1669	Date 12/20/17
Sandra Brozuský	EPA/OCE/(206) 553-5317	
Signature of Management Q A Reviewer 	Agency/Office/Phone and Fax Numbers EPA/R10/OCE/MIRE	Date 2/8/18

INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	U IU Inspection with Pretreatment Audit	! Pretreatment Compliance (Oversight)
B Compliance Biomonitoring	X Toxics Inspection	@ Follow-up (enforcement)
C Compliance Evaluation (non-sampling)	Z Sludge - Biosolids	{ Storm Water-Construction-Sampling
D Diagnostic	# Combined Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
F Pretreatment (Follow-up)	\$ Combined Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
G Pretreatment (Audit)	+ Sanitary Sewer Overflow-Sampling	~ Storm Water-Non-Construction-Non-Sampling
I Industrial User (IU) Inspection	& Sanitary Sewer Overflow-Non-Sampling	< Storm Water-MS4-Sampling
J Complaints	\ CAFO-Sampling	- Storm Water-MS4-Non-Sampling
M Multimedia	= CAFO-Non-Sampling	> Storm Water-MS4-Audit
N Spill	2 IU Sampling Inspection	
O Compliance Evaluation (Oversight)	3 IU Non-Sampling Inspection	
P Pretreatment Compliance Inspection	4 IU Toxics Inspection	
R Reconnaissance	5 IU Sampling Inspection with Pretreatment	
S Compliance Sampling	6 IU Non-Sampling Inspection with Pretreatment	
	7 IU Toxics with Pretreatment	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)	O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
B — EPA (Contractor)	P — Other Inspectors, State (Specify in Remarks columns)
E — Corps of Engineers	R — EPA Regional Inspector
J — Joint EPA/State Inspectors—EPA Lead	S — State Inspector
L — Local Health Department (State)	T — Joint State/EPA Inspectors—State lead
N — NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 — Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 — Federal. Facilities identified as Federal by the EPA Regional Office.
- 5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

**NPDES
Inspection Report**

**Homefire Prest Logs Ltd.
(NPDES Permit #: WAR125508)**

Ferndale, Washington

December 15, 2017

Prepared by:

**Joe Roberto
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Multimedia Inspection and RCRA Enforcement Unit**

Table of Contents

I.	Facility Information
II.	Inspection Information
III.	Scope of Inspection
IV.	Compliance History
V.	Inspection Entry
VI.	Facility Description/Background
VII.	Permit Information
VIII.	Permit Applicability and Requirements
IX.	Facility Tour
X.	Records Review
XI.	Stormwater Generation, Treatment and Discharge
XII.	Receiving Water
XIII.	Benchmark Monitoring
XIV.	Addressing Previous Areas of Concern
XV.	Areas of Concern
	A. Training Documentation
	B. pH Holding Time Exceedances
	C. Monthly Visual Inspection Report Availability
	D. Zinc Benchmark Concerns
	E. Discharge from the West Side of the Facility
XVI.	Closing Conference

Attachments

A.	Aerial Image
B.	Photograph Documentation
C.	Permit Coverage Letter
D.	Notice of Intent
E.	Stormwater Pollution Prevention Plan
F.	Benchmark Sample Results Table
G.	4 th Quarter 2015 Sample Documentation
H.	Record of Communication Between Ms. Virginia Hermanson and Joe Roberto

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Virginia Hermanson or from observations during the inspection.)

I. Facility Information

Facility Name: Homefire Prest Logs Ltd. (facility)

Owner and Operator: Homefire Prest Logs Ltd.

Facility Contact(s):

Name	Title	Phone Number	Email Address
Clayton Hermanson	Operations Manager	(360) 366-2200	chermanson@homefirelogs.com
Virginia Hermanson	Vice President	(360) 366-2200	info@homefirelogs.com

Physical/Mailing Address: 6925 Salashan Parkway
Ferndale, Washington 98248

GPS Coordinates: +48.894553°/-122.601779°
(Obtained from the Ecology PARIS database.)

Receiving Water: California Creek

Permit #: WAR125508

Number of Employees: 11

Length of Operation: The facility began operating in October 2010.

Facility Size: Approximately 3.5 acres

II. Inspection Information

Inspection Date	December 15, 2017
Time Arrived	10:45 AM
Time Departed	1:30 PM
Weather Condition	Rainy
Facility Representatives Present	Virginia Hermanson
EPA Inspectors Present	Joe Roberto (Lead Inspector) Sandra Brozusky
Observed Discharge	I saw water flowing in the discharge pipeline along the east side of the facility. However, it is unknown whether this water was discharging into California Creek at the time of the inspection.

III. Scope of Inspection

The primary focus of this inspection was to conduct a compliance evaluation inspection to determine compliance with the Washington Industrial Stormwater General Permit (ISGP) and Section 402 of the Clean Water Act. For this facility, this meant evaluating the management of stormwater at the site.

In addition, the purpose of this inspection was to determine whether the facility addressed the areas of concern raised during the prior EPA inspection of the facility (conducted on April 23, 2015).

In general, this inspection consisted of an opening conference to discuss the purpose and expectations of the inspection, a facility tour to inspect potential stormwater impacted areas of the site, a records review, and a closing conference to discuss the areas of concern identified during the inspection.

We did not collect samples at the time of this inspection.

IV. Compliance History

Date of Last Inspection:	This facility was last inspected on April 23, 2015 by EPA.
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Enforcement Actions:	This facility has not been issued any penalty or compliance orders for purposes of compliance with the ISGP, based on review of agency records.
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V. Inspection Entry

Specifics regarding entry at this facility are as follows:

- This was an unannounced inspection.
- We (the inspection team) presented credentials to Ms. Virginia Hermanson upon arriving at the facility.
- I (Joe Roberto) explained to Ms. Hermanson that this visit was a compliance inspection to determine compliance with the ISGP and the Clean Water Act and to determine whether the concerns raised during the April 23, 2015 EPA inspection were addressed.
- Ms. Hermanson did not deny us access to the facility.
- Ms. Hermanson accompanied us throughout the inspection.
- We were allowed to inspect all areas of the facility that we wished to inspect.

VI. Facility Description/Background

Based on observations during this inspection, this facility has not changed the general operation of the facility since the last inspection conducted in April 2015. In general, Homefire Prest Logs Ltd. produces compressed fire logs for use in such things as wood burning fireplaces and stoves. These fire logs are produced from sawmill wood wastes (consisting mainly of sawdust and wood shavings).

This facility consists mainly of a building (which houses the office, product storage area, and log manufacturing area), a parking lot, and the loading dock where wood waste is transferred to the facility.

The bulk of the processing activity at this facility occurs indoors within the building mentioned above. These indoor activities are not exposed to precipitation and as a result do not impact stormwater.

The parts of this facility where industrial activities occur that are exposed to precipitation include the parking lot, the loading docks on the north side of the facility and the west side of the facility in the vicinity of the building dust collection system. The activities occurring in the vicinity of the loading docks include the transfer of raw materials (sawdust and wood shavings) from tractor trailers to bins at the facility.

The activities occurring in the area of the dust collection system include day to day operation and maintenance of the dust collection system.

See Attachments A and B for details regarding the main components at this facility.

VII. Permit Information

At the time of the inspection, the facility was covered under the Washington ISGP (Permit # WAR125508). According to information available in the Washington Department of Ecology PARIS database, Homefire Prest Logs Ltd. has been covered under a Washington ISGP since November 15, 2010.

See Attachment C for a copy of the permit coverage letter dated December 3, 2014. This permit coverage letter indicates that the facility obtained coverage for the ISGP that became effective on January 2, 2015.

VIII. Permit Applicability and Requirements

The facility's NOI for coverage under the ISGP indicates that the Standard Industrial Classification (SIC) code for the activity conducted at this facility is 2499 (Wood Products, Not Elsewhere Classified). According to Condition S1 of the ISGP, facilities that fall under SIC code 2499 are eligible for permit coverage under the ISGP. See

Attachment D for a copy of the NOI submitted by this facility for coverage under the ISGP.

Coverage under the ISGP means that this facility is responsible for complying with ISGP requirements including the following:

- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) to cover stormwater related activities at the facility as established in Condition S3.A.1 of the ISGP.
- Conduct and document visual facility inspections as established in Condition S7.A.1 of the ISGP. These inspections must be conducted monthly.
- Conduct quarterly benchmark monitoring for turbidity, pH, oil sheen, copper, and zinc as established in Condition S4 and Table 2 of the ISGP.
- Conduct quarterly benchmark monitoring for COD and TSS as established in Table 3 of the ISGP.
- Prepare and submit discharge monitoring reports (DMRs) which document the results of quarterly benchmark monitoring as established in Condition S9.A of the ISGP.
- Perform corrective actions to assure that stormwater discharges from the facility are achieving benchmark limitations as established in Condition S8 of the ISGP.
- Prepare and submit an annual report to Ecology that documents the corrective actions conducted during the calendar year as established in Condition S8.B of the ISGP.

These listed permit requirements were the primary focus of the inspection. Where deficiencies were observed, I have documented them in the “Areas of Concern” section of this report.

IX. Facility Tour

During the facility tour we examined all areas occupied by this facility including the material storage areas, loading docks, storm drains, stormwater outfalls, and the vicinity of the dust collection system.

See Attachments A and B for details regarding the facility tour.

X. Records Review

As part of the inspection, I requested that the following documents be produced for review:

- **NPDES Permit** – At the time of the inspection, Ms. Hermanson produced a copy of the latest version (effective January 2, 2015) of the permit as requested.
- **DMRs** – At the time of the inspection, I requested to see all DMRs prepared for the facility since the last EPA inspection (conducted on April 23, 2015). Ms. Hermanson produced the DMRs as requested.
- **SWPPP** – At the time of the inspection, I asked Ms. Hermanson to provide a copy of the latest SWPPP. Ms. Hermanson provided a copy of a SWPPP, dated June 2015. See Attachment E for a copy of the SWPPP.
- **Monthly Visual Inspection Reports** – At the time of the inspection, I asked Ms. Hermanson to produce all monthly visual inspection reports since the last EPA inspection (conducted on April 23, 2015). Ms. Hermanson produced the monthly visual inspection reports as requested except for the November 2017 report.
- **Annual Reports** – At the time of the inspection, I requested the annual reports for 2015 and 2016. Ms. Hermanson produced these reports as requested.
- **Training Records** – At the time of the inspection, I requested the employee training records for 2015 and 2016. Ms. Hermanson was not able to produce these training records. In addition, Ms. Hermanson said that the only training they do provide is through safety meetings.

Note that the review of the above documents was not a comprehensive review designed to identify all deficiencies. Rather, the review of these documents was more cursory in nature.

Any records deficiencies observed are listed in the “Areas of Concern” section of this report.

XI. Stormwater Generation, Treatment and Discharge

The operation of this facility is such that the bulk of the discharge from this facility is stormwater resulting from precipitation falling within the footprint of the facility. This facility is set up such that there are two drainage areas that route stormwater.

One drainage area drains the area of the parking lot (on the north and east sides of the building) and the area of the loading docks on the north side of the building. Drainage from this area is routed east to a roadside ditch and then south to California Creek. See

Attachment A and photograph #s 2 thru 4 of Attachment B of this report for details of this drainage area.

The second drainage area at this facility is the area in the vicinity of the dust collection system. Information on page 1 of the facility SWPPP states that “The west side of the site drains to a private stormwater pond facility operated by COPAC, Inc...” See Attachment E of this report for a copy of the SWPPP. See also Attachment A and photograph #5 of Attachment B for details regarding this drainage area.

In addition, the site map of the facility on page 6 of the SWPPP shows (with the use of arrows) that drainage from the west side of the facility flows toward the stormwater pond. The SWPPP, however, does not clearly establish whether the COPAC operated stormwater pond ultimately discharges to waters of the United States.

Observations at the time of the inspection indicate that stormwater management at this facility includes the following best management practices:

- the incorporation of filter socks in the storm drains,
- general cleaning in the vicinity of the storm drains, and
- a treatment system to treat roof drainage.

XII. Receiving Water

Information from the facility SWPPP indicates that stormwater from this facility flows to California Creek. California Creek runs along the south side of the facility. See Attachments A and E of this report for details regarding the location of California Creek.

XIII. Benchmark Monitoring

As indicated in the facility’s permit coverage letter (Attachment C), this facility is required to monitor for turbidity, pH, oil sheen, total copper, total zinc, chemical oxygen demand (COD), and total suspended solids (TSS). This monitoring must be conducted once per quarter from each stormwater discharge outfall. For this facility, although two potential outfalls are identified, only one outfall has been monitored. The outfall being monitored covers the drainage from the parking lot, the bulk of the roof runoff and the area of the loading dock. See Attachment F of this report which is a table that identifies the sample results for samples collected since June 2012.

The sample results for the time period between the first EPA inspection (conducted on April 23, 2015) and the December 15, 2017 inspection indicate the following:

- Oil sheen observations were not reported during the 1st and 4th quarters of 2016 and the 1st quarter of 2017,
- Two zinc samples were collected for the 4th quarter of 2015, however, only one zinc measurement was reported in the DMR, and

- pH samples were analyzed by an outside laboratory which will likely result in the exceedance of the sample holding time.

See the “Areas of Concern” section of this report for further details regarding benchmark related areas of concern.

XIV. Addressing Previous Areas of Concern

As indicated above, one of the reasons for conducting this inspection was to determine how the facility addressed areas of concern raised during the April 23, 2015 EPA inspection. According to Ms. Hermanson, since the 2015 inspection, the facility hired a consultant to help with stormwater management. This consultant provided help with, among other things, SWPPP and monthly visual inspection report template development.

The following is a list of the concerns raised during the 2015 inspection as well as a description of how these concerns were addressed:

- **SWPPP Development**

At the time of the 2015 inspection, Mr. Clayton Hermanson indicated that a SWPPP had not yet been developed for the facility.

At the time of the 2017 inspection, Ms. Hermanson indicated that subsequent to the EPA inspection in 2015, the facility hired a consultant who prepared a SWPPP for the facility. See Attachment E of this report for a copy of the SWPPP, dated June 2015.

- **Monthly Visual Inspections**

At the time of the 2015 inspection, I asked Mr. Hermanson to produce all monthly visual inspection reports prepared for this facility. Mr. Hermanson said that he does conduct the visual inspections which includes checking the storm drains and changing the storm drain filter socks. However, Mr. Hermanson also indicated that he never documented any of these visual observations. He said that he “did not know that he had to write anything down.”

During the 2017 inspection, I asked Ms. Hermanson to provide all the monthly visual inspection reports since the previous EPA inspection conducted on April 23, 2015. Ms. Hermanson produced all but one of the monthly visual inspection reports requested. See the “Areas of Concern” section of this report for details.

- **DMR Submittal**

At the time of the 2015 inspection, I asked Mr. Hermanson to produce all DMRs generated for this facility. Mr. Hermanson was not able to produce the DMRs at the time of the inspection. In addition, information obtained from Ecology around the time of the 2015 inspection indicates that no DMRs were ever submitted to Ecology as required by the NPDES permit.

At the time of the 2017 inspection, I asked Ms. Hermanson to provide all DMRs prepared for the facility since the EPA inspection conducted on April 23, 2015. Ms. Hermanson produced the DMRs as requested.

- **Quarterly Benchmark Monitoring**

At the time of the 2015 inspection, benchmark monitoring was not conducted as frequently (quarterly) as required by the NPDES permit. Information available at the time of the 2015 inspection indicated that monitoring was only conducted during the 2nd and 4th quarters of 2012 and the 1st and 4th quarters of 2014.

Another monitoring deficiency observed at the time of the 2015 inspection is that even during the quarters that monitoring was conducted, the monitoring was incomplete. The permit requires that this facility monitor for turbidity, pH, oil sheen, copper, zinc, COD, and TSS. However, the file information indicates that pH and oil sheen were not monitored or reported for the quarters during which samples were collected and analyzed.

At the time of the 2017 EPA inspection, I asked Ms. Hermanson to provide documentation for the quarterly benchmark monitoring conducted since the EPA inspection conducted on April 23, 2015. Ms. Hermanson provided information indicating that benchmark monitoring was conducted quarterly as required by the permit. See Attachment F of this report for details regarding all the sampling conducted at the facility.

- **Annual Report Submittal**

At the time of the 2015 inspection, I asked facility representatives to produce annual reports prepared for the facility for 2011, 2012, 2013, and 2014. Facility representatives produced all reports as requested, except for the 2013 annual report.

At the time of the 2017 EPA inspection, I asked Ms. Hermanson to produce, for review, the 2015 and 2016 annual reports. Ms. Hermanson produced these reports as requested.

- **Representative Samples**

At the time of the 2015 inspection, I identified that stormwater samples were collected from a roof downspout. This sample location was not representative of the stormwater discharged from the facility.

During the 2017 inspection, Ms. Hermanson indicated that the stormwater samples collected for the facility are now collected of stormwater emanating from a roadside ditch along the east side of the facility. This sample collection location reflects the discharges from roof runoff as well as discharges from other areas of the facility.

- **Understanding of Stormwater Flow**

At the time of the facility tour portion of the 2015 inspection, I saw a storm drain in the west (or back) side of the facility. I asked Mr. Hermanson where stormwater entering this drain would ultimately flow. Mr. Hermanson responded by saying that this water is routed to a stormwater pond located in the neighboring property to the west.

I then asked Mr. Hermanson whether this stormwater pond overflowed and whether this overflow could reach another waterbody. Mr. Hermanson said that he did not know. He also said that the pond was owned by COPAC (Coast Pacific, Inc.) which is the entity that developed the property currently occupied by the facility as well as the neighboring properties adjacent to the stormwater pond.

The concern raised at the time of the 2015 inspection is that facility representatives do not have an accurate understanding of stormwater flow because of the drainage uncertainties pertaining to the stormwater flow on the west (or back) side of the facility.

During the 2017 inspection, I once again inspected the back side of the facility. I asked Ms. Hermanson about the runoff generated from the back side of the facility and the storm drain in that area. Ms. Hermanson indicated that she was not certain where stormwater generated in the back side of the facility would ultimately flow. In addition, she questioned whether the storm drain in this area was needed. Based on discussions with Ms. Hermanson during the 2017 inspection and on observations at the time of the inspection, it was apparent that the area of concern pertaining to this back side discharge had not been addressed.

See the “Areas of Concern” section of this report for further details.

- **Records Availability Onsite**

At the time of the 2015 inspection, I requested to see documents that are required to be kept onsite including the NPDES permit. Mr. Hermanson was not able to produce the permit at the time of the 2015 inspection, as required by the permit.

During the 2017 inspection, however, Ms. Hermanson produced the permit as requested.

- **Turbidity Sample Results**

At the time of the 2015 inspection, I reviewed sample results for samples collected up to that point. The review of the sample results revealed that turbidity results were reported incorrectly in mg/l units instead of NTU.

During the 2017 inspection, I reviewed the turbidity results for samples collected during the 4th quarter of 2015. This quarterly documentation suggests that turbidity results are now correctly reported in units of NTU.

XV. Areas of Concern

At the time of the 2017 inspection I identified several areas of concern. Specifically, the concerns at this facility are identified as follows:

A. Training Documentation

Condition S3.B.4.b.i.5 of the Washington ISGP states that “The SWPPP shall include BMPs to provide SWPPP training for employees who have duties in areas of industrial activities subject to the permit.”

This condition of the permit goes on to specify that at a minimum, the training plan shall include a log of the dates on which employees received training.

At the time of the inspection, I asked Ms. Hermanson for documentation regarding employee training. Ms. Hermanson responded by saying that the only training provided is done during safety meetings. Ms. Hermanson also indicated though that these safety meetings are not documented.

B. pH Holding Time Exceedances

Table 2 in Condition S5 of the ISGP specifies several of the parameters that must be analyzed by the permittee, including pH.

Condition S4.C of the ISGP states that “The Permittee shall ensure that analytical methods used to meet the sampling requirements in this permit conform to the latest revision of the Guidelines Establishing Test Procedures for the Analysis of Pollutants contained in 40 CFR Part 136.”

40 CFR Part 136 specifies, among other things, the sample holding times for various parameters. This part of the code of federal regulations specifies that pH must be analyzed immediately (or within fifteen minutes) after sample collection.

At the time of the 2017 inspection, I randomly selected the results for samples collected during the 4th quarter of 2015 for a more detailed review. Review of these results indicate that all parameters (including pH) were analyzed by an outside laboratory (Avocet Environmental Testing) located in Bellingham, Washington. The sample documentation from Avocet for the 4th quarter 2015 sample results is included as Attachment G to this report. Note that this documentation indicates that the holding time for pH was exceeded.

At the time of the 2017 inspection, Ms. Hermanson indicated that all pH samples were analyzed by Avocet Lab. Because the holding time for pH samples is only 15 minutes, it is likely that the holding time was exceeded for all pH samples analyzed by Avocet Lab. However, I did not collect adequate information at the time of this inspection to definitively show that the holding time was exceeded for all pH sample analyzed by Avocet Lab.

C. Monthly Visual Inspection Report Availability

Condition S7.A.1 of the Washington ISGP states that “The Permittee shall conduct and document visual inspections of the site each month.”

Condition S7.C.1 of the Washington ISGP states that “The Permittee shall record the results of each inspection in an inspection report or checklist and keep the records on-site for Ecology review.”

In addition, Condition S9.C.1.d of the Washington ISGP specifies that the Permittee shall retain documents onsite, including inspection report documentation, for a minimum of five years.

At the time of the inspection, I asked Ms. Hermanson to produce all monthly visual inspection reports prepared for this facility since the EPA inspection conducted on April 23, 2015. Ms. Hermanson provided all the reports requested except for November 2017.

According to Ms. Hermanson, the November 2017 visual inspection was conducted and the corresponding inspection report was generated. Ms. Hermanson indicated, however, that the inspection report was misplaced.

D. Zinc Benchmark Concerns

Condition S4.B.1.a of the Washington ISGP states that “The Permittee shall sample the discharge from each designated location at least once per quarter...”

Conditions S5.A and S5.B of the ISGP specify that the facility must sample its stormwater discharges for several parameters including total zinc.

In addition, Condition S5.B.2 of the ISGP states that “Permittees sampling more than once per quarter shall average the sample results for each parameter and compare the average value to the benchmark to determine if the discharge has exceeded a benchmark.

Review of the 4th quarter 2015 monitoring documentation indicates that two samples were collected and analyzed for zinc during that quarter. One sample was collected on October 12, 2015 which resulted in a zinc value of 164 ug/l. The second sample was collected on November 17, 2015 which resulted in a zinc value of 121 ug/l.

Review of the 4th quarter 2015 DMR, however, indicates that only the zinc result obtained in November (121 ug/l) was reported in that quarterly DMR. I asked Ms. Hermanson at the time of the inspection, why only one sample result was reflected in the DMR. She responded by saying that she did not know that the two sample results had to be averaged.

One concern is that the two zinc samples collected for the 4th quarter of 2015 were not averaged as required by Condition S5.B.2 of the ISGP.

Another concern is that both samples resulted in zinc values greater than the benchmark value. Note, however, that the facility responded to these elevated zinc values by constructing a treatment system to treat roof runoff from the galvanized roof on the facility building structure. According to Ms. Hermanson, this treatment system was installed in approximately January 2016.

See Attachment G of this report for a copy of the 4th quarter 2015 sample documentation.

E. Discharge from the West Side of the Facility

Condition S4 of the permit specifies that the permittee shall conduct quarterly sampling of stormwater. In addition, this condition of the permit also specifies that the permittee sample each distinct point of discharge except under certain circumstances.

During the facility tour portion of the inspection, while inspecting the west (or back) side of the facility, I saw a storm drain in the area. The facility SWPPP indicates that stormwater in this area of the facility is routed to a private stormwater pond facility operated by COPAC, Inc.

Although information exists to show that runoff from the west side of the facility flows to the COPAC operated stormwater pond, there is uncertainty about whether runoff from this portion of the facility results in a discharge that must be monitored. The uncertainty in this situation is based on several unknown aspects about the stormwater runoff, including:

- Does the COPAC owned stormwater pond overflow?
- If the stormwater pond does overflow, at what frequency does it overflow?
- Does the overflow from the stormwater pond reach surface waters (or waters of the United States)?

Note that runoff from the west side of the facility has never been monitored.

One concern regarding this west side discharge is that if stormwater from the stormwater pond does reach waters of the United States, then this facility is not monitoring this discharge as required by the ISGP.

Another concern with respect to the stormwater discharges from the west side of the facility is that facility representatives do not have an accurate understanding of stormwater flow from the facility which is inconsistent with ISGP requirements. As indicated above, this concern was also raised during the closing conference to the 2015 EPA inspection.

Subsequent to the 2017 inspection (on February 5, 2018), I spoke to Ms.

Hermanson about the drainage from the west side of the facility. Ms. Hermanson indicated that the storm drain located in this area of the facility will be permanently sealed resulting in no discharge from the facility to the private stormwater pond. Ms. Hermanson also indicated that currently there is a cover over this storm drain and that the permanent seal will be in place within a week. See Attachment H of this report for a copy of the record of communication pertaining to this west side discharge.

XVI. Closing Conference

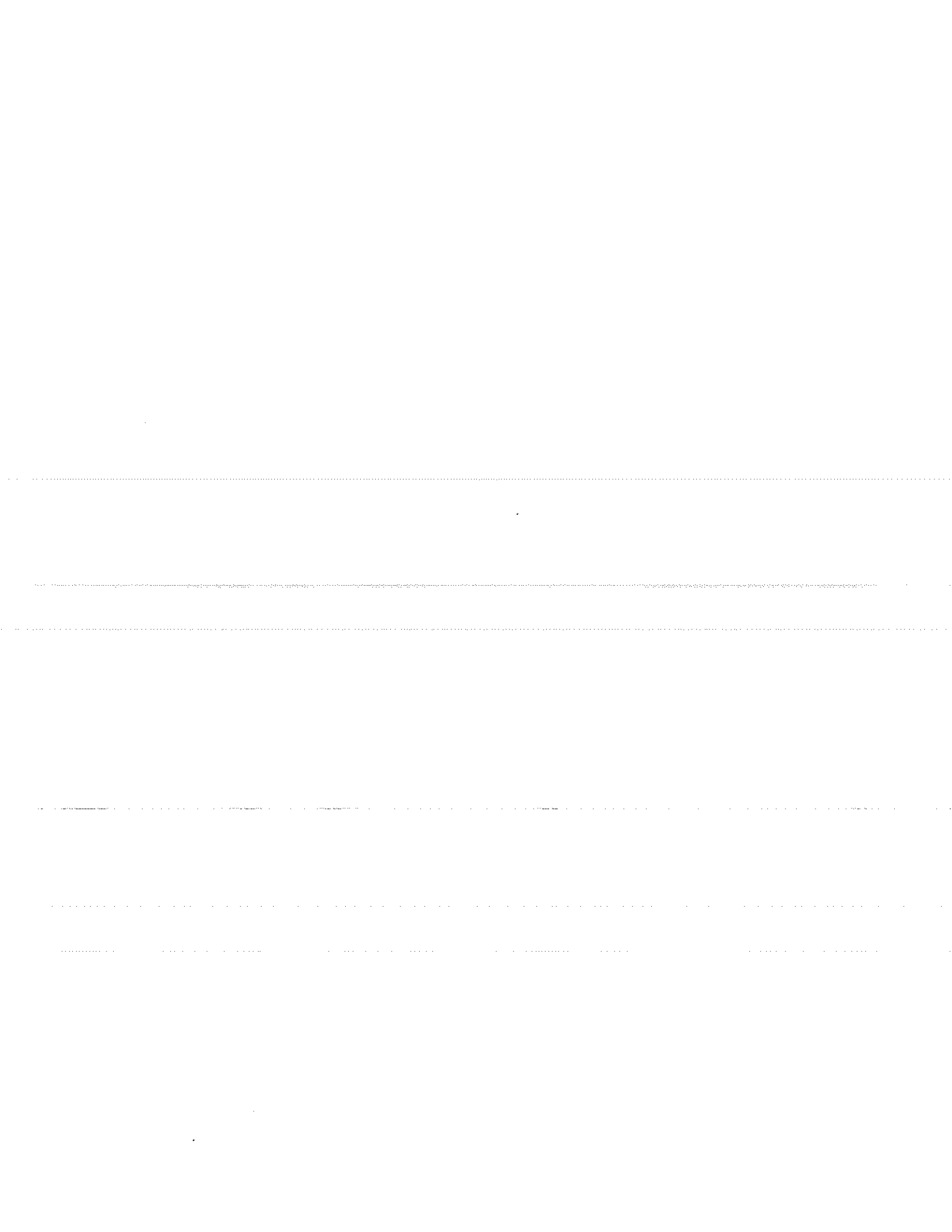
Prior to concluding the inspection, I held a closing conference with Ms. Hermanson on December 15, 2017. The purpose of this closing conference was to discuss the preliminary findings of the inspection. I discussed the areas of concern listed above and then I thanked Ms. Hermanson for her time and assistance with the inspection.

Report Completion Date:

February 5, 2018

Lead Inspector Signature:

Joel L. H




ATTACHMENT A

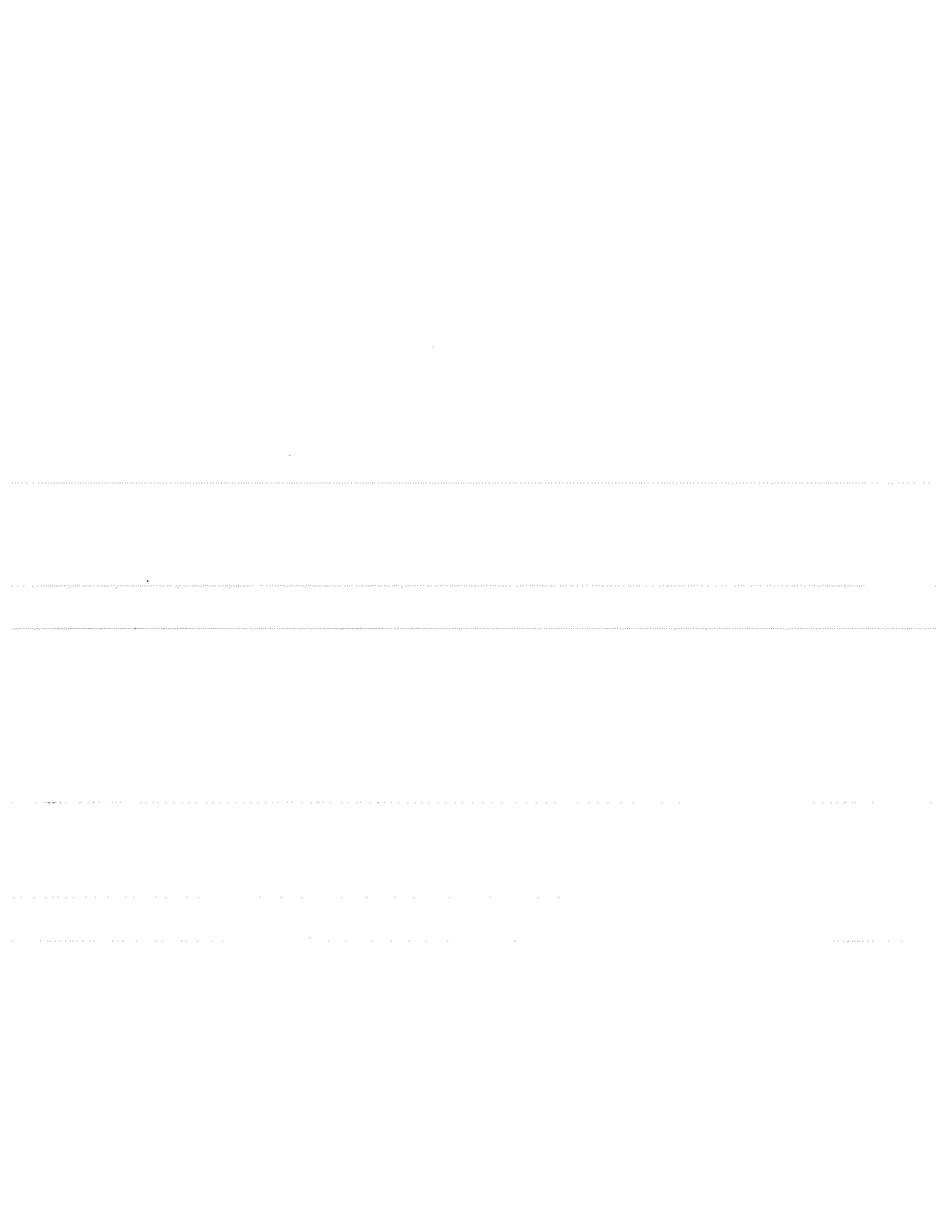
Aerial Image

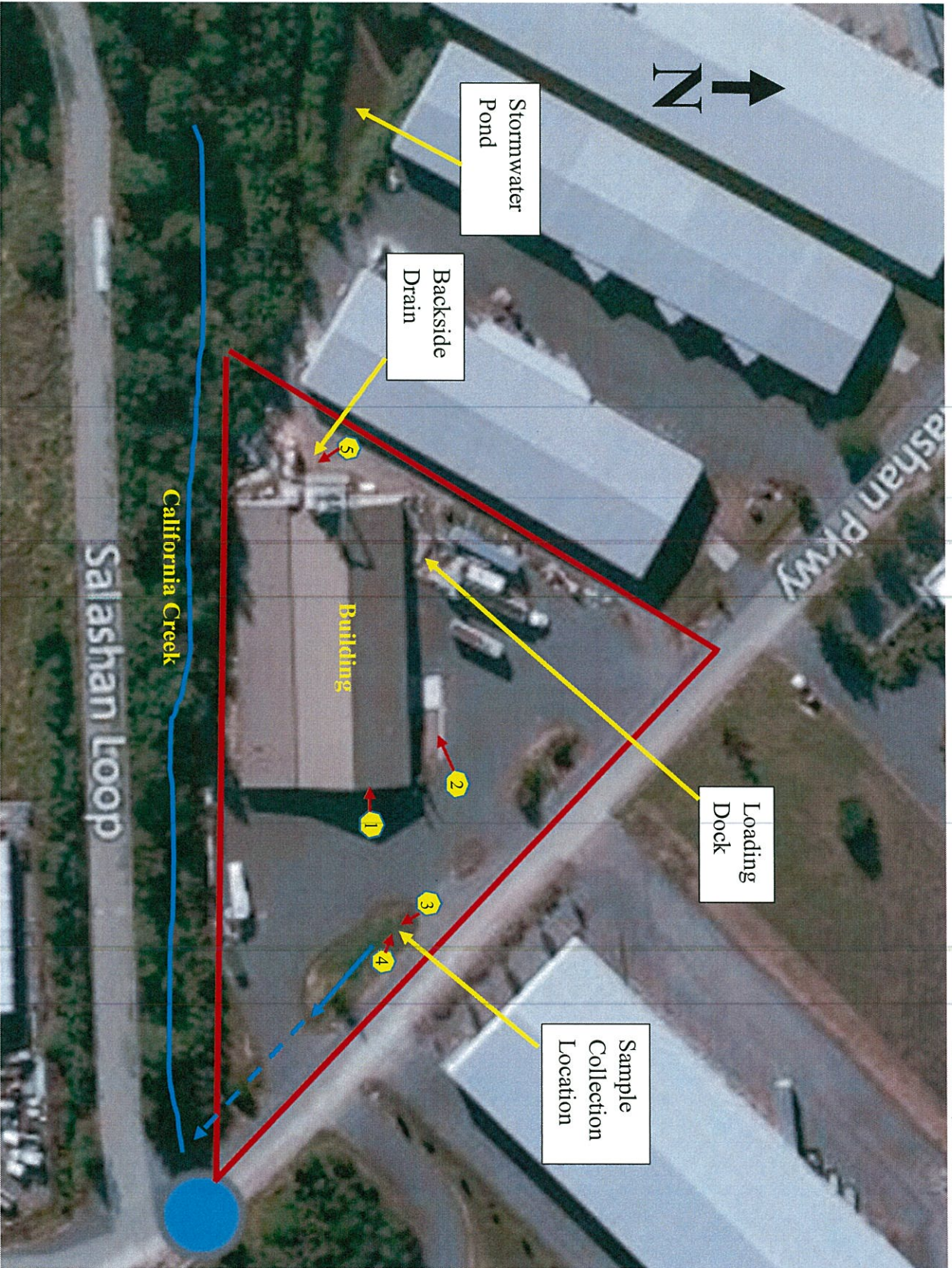
(Aerial Image Retrieved From Bing.com)

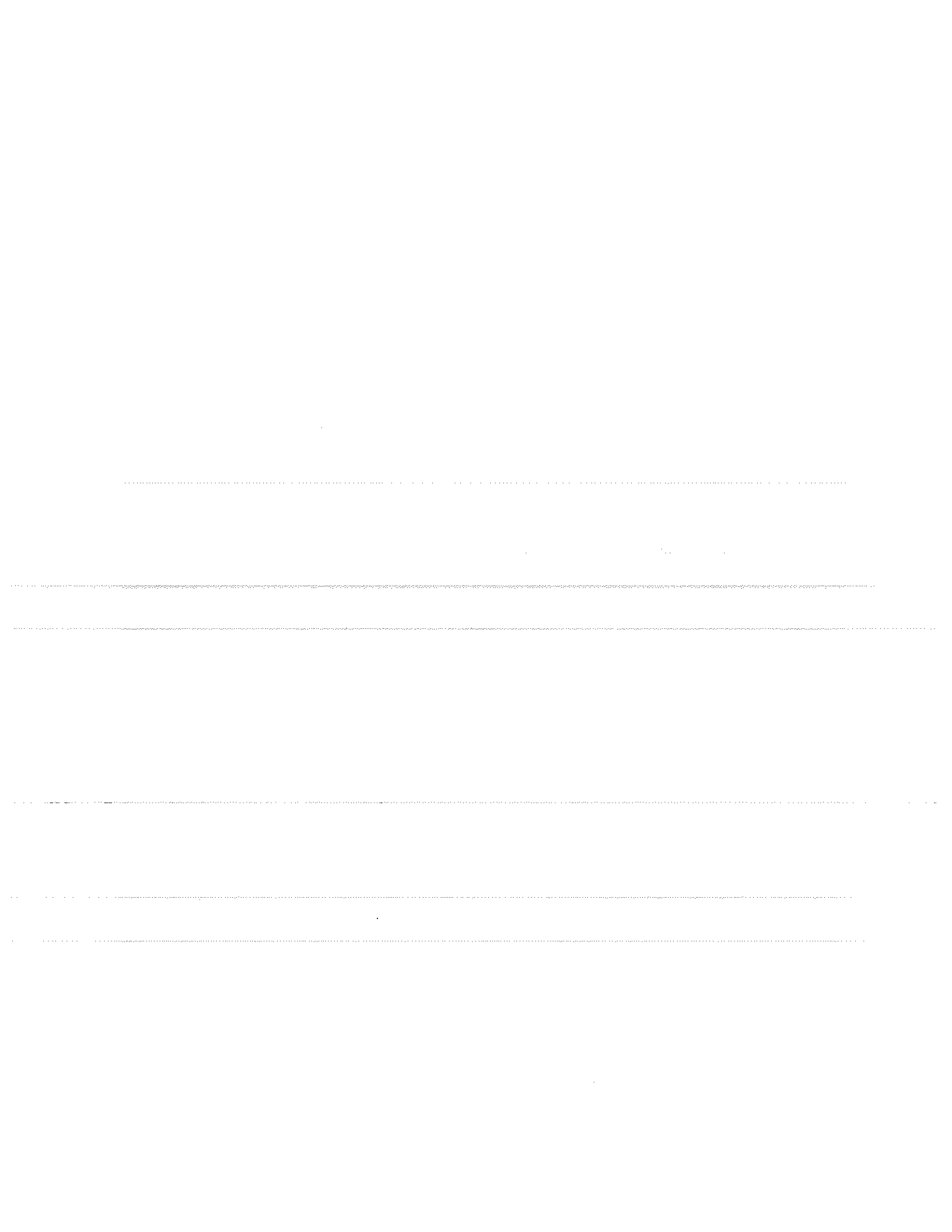
Legend:

The hexagons () on this aerial image identify the **approximate** location and direction of the photographs shown in the Photograph Documentation (Attachment B). The number within the hexagon corresponds with the Photograph Documentation photo number. The arrow attached to the hexagon indicates the direction of the photograph.

Homefire Prest Logs Ltd.







ATTACHMENT B

Photograph Documentation

Unless otherwise noted, all photographs were taken by Sandra Brozusky on December 15, 2017.

The location and direction of several of the photographs in this Photograph Documentation attachment are shown on the aerial image in Attachment A of this report.

Homefire Prest Logs Ltd.

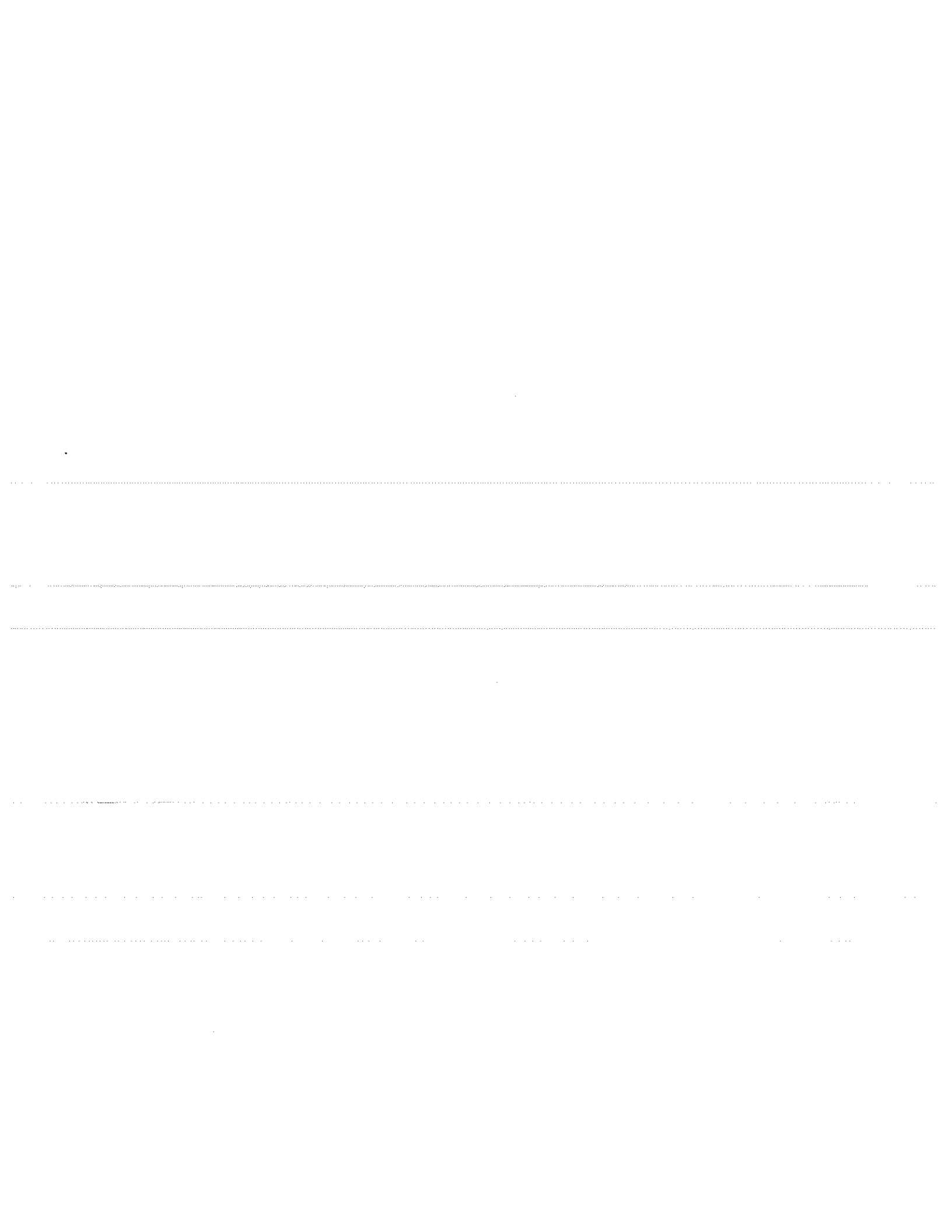




Photo #1: Facility sign. #DSCN0581.JPG.



Photo #2: View of the "Grattix" treatment filters installed by the facility for roof runoff. According to Ms. Hermanson, the facility installed a total of 8 treatment filters to treat roof runoff. Four of the eight can be seen in this photograph. #DSCN0584.JPG.



Photo #3: Southeasterly view of the facility's stormwater sampling location. Water seen here will be routed to California Creek. #DSCN0582.JPG.



Photo #4: Up-close view of the facility's stormwater sampling location. #DSCN0583.JPG.



Photo #5: View of a storm drain located on the west side of the facility. According to the facility's SWPPP this drain leads to a pond located west of the facility as part of a commercial development complex. #DSCN0585.JPG.

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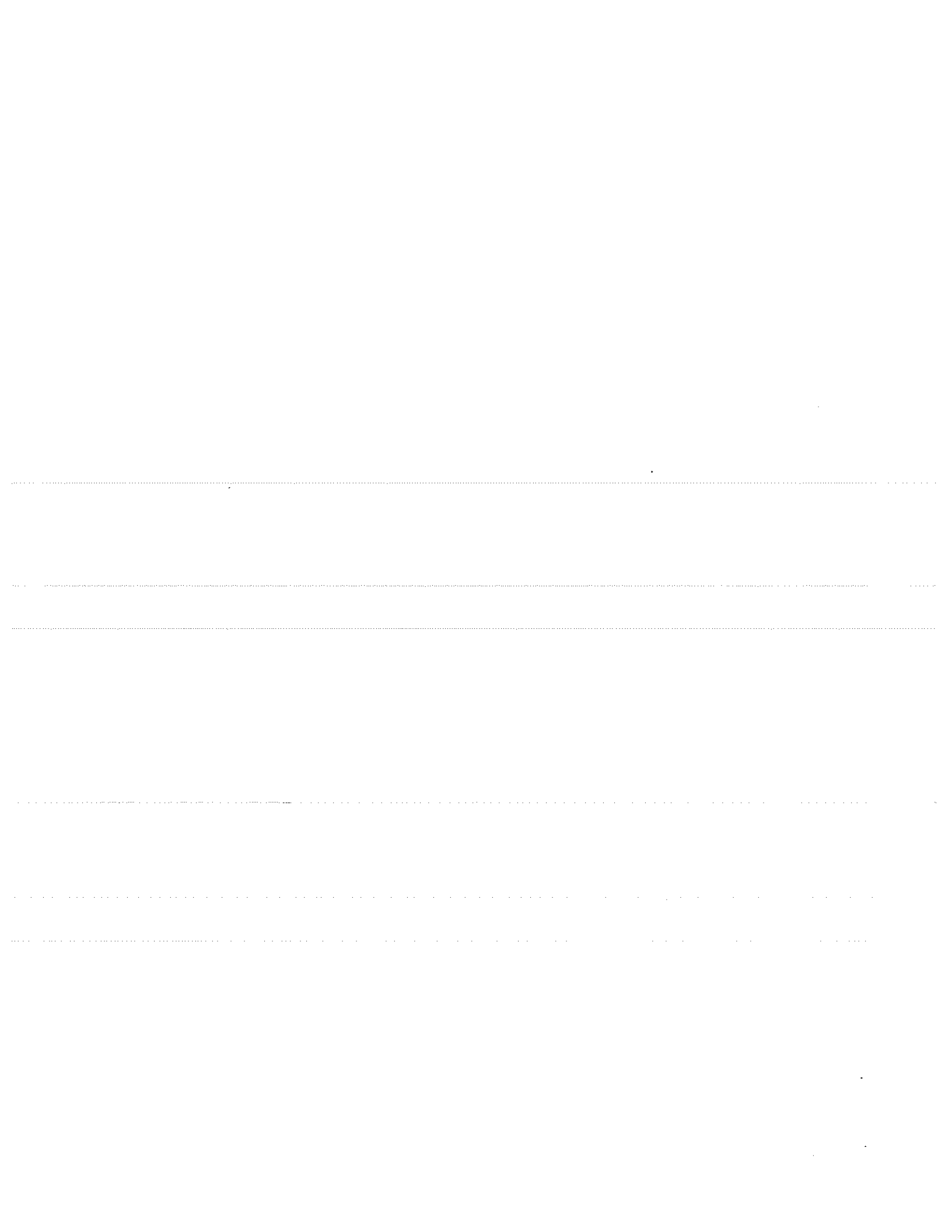
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ATTACHMENT C

Permit Coverage Letter

Dated: December 3, 2014

Homefire Prest Logs Ltd.





STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

December 3, 2014

Virginia Hermanson
Vice President
Homefire Prest Logs Ltd.
6925 Salashan Pkwy
Ferndale, WA 98248-8314

Facility Name: Homefire Prest Logs
Location: 6925 Salashan Pkwy
Ferndale, WA 98248
Permit No: WAR125508
County: Whatcom

RE: Reissuance of Coverage under the Industrial Stormwater General Permit

Dear Virginia Hermanson:

The Washington Department of Ecology (Ecology) has reissued the Industrial Stormwater General Permit (permit). A copy of your new permit is enclosed. **Retain this letter with your permit and Stormwater Pollution Prevention Plan. It is the official record of permit coverage for your facility.** Ecology issued the final permit December 3, 2014 and it becomes effective January 2, 2015.

Permit Overview

The new permit has a number of changes. The most significant changes are summarized in the enclosed "Summary of Changes" table. You can find more information on Ecology's website at: <http://www.ecy.wa.gov/programs/wq/stormwater/industrial/index.html>. Please contact Ecology if you have any questions.

New Reporting Requirements

Beginning in 2015, you must submit Discharge Monitoring Reports and Annual Reports electronically, using Ecology's Water Quality Permitting Portal— Permit Submittals application, unless a waiver from electronic reporting has been granted. You can find more information regarding Ecology's Water Quality Permitting Portal on our website at: <http://www.ecy.wa.gov/programs/wq/permits/paris/webdmr.html>.

If you have technical questions regarding Ecology's Water Quality Permitting Portal, please contact the portal staff at (800) 633-6193/option 3 or email WQWebPortal@ecy.wa.gov.

Site Specific Monitoring Requirements

Enclosed is a summary of the monitoring requirements for your facility. This summary is based on the best information available to Ecology about your facility. If you believe there is a discrepancy between what the permit requires and the enclosed summary, please contact Ecology immediately. In the case of a difference between the permit as applied to your facility and the summary, the permit requirements take precedence.

Your Right to Appeal the Permit

You have a right to appeal the terms and conditions of this general permit to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this permit issuance notice. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do the following within 30 days of the date of receipt of this notice:

- File your appeal and a copy of this notice with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this notice on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

Address and Location Information

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel Road SW, Suite 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

For Additional Information or Assistance

Ecology is committed to providing assistance to you. Please review our web page at <http://www.ecy.wa.gov/programs/wq/stormwater/industrial/index.html>. For questions about transfers, terminations, and other administrative issues, please contact Shawn Hopkins at shop461@ecy.wa.gov or (360) 407-6442.

If you have questions regarding stormwater management issues at your site, please contact Kurt Baumgarten at kuba461@ecy.wa.gov or (360) 715-5210.

Questions

If you have questions regarding the permit, please contact Jeff Killelea at jeff.killelea@ecy.wa.gov or (360) 407-6127.

Sincerely,



Bill Moore, P.E., Manager
Program Development Services Section
Water Quality Program

Enclosures

Permit No: WAR125508
Facility Name: Homefire Prest Logs
Location: 6925 Salashan Pkwy
 Ferndale, WA 98248
SIC Codes: 2499

Summary of Your Facility's ISGP Monitoring Requirements

This summary is based on the best information available to Ecology about your facility. If you believe there is a discrepancy between what the permit requires and the enclosed summary, please contact Ecology immediately. In the case of a difference between the permit as applied to your facility and the summary, the permit requirements take precedence.

Benchmarks and Sampling Requirements Applicable to All Facilities (Condition S5, Table 2)

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Level ¹
Turbidity	NTU	25	EPA 180.1 Meter	0.5
pH	SU	Between 5.0 - 9.0	Meter/Paper ²	±0.5
Oil Sheen	Yes/No	No visible oil sheen	N/A	N/A
Copper, Total	µg/L	Western WA: 14 Eastern WA: 32	EPA 200.8	2.0
Zinc, Total	µg/L	117	EPA 200.8	2.5

¹The Permittee shall ensure laboratory results comply with the quantitation level (QL) specified in the table. However, if an alternate method from 40 CFR Part 136 is sufficient to produce measurable results in the sample, the Permittee may use that method for analysis. If the Permittee uses an alternative method it must report the test method and QL on the discharge monitoring report.

²Permittees shall use either a calibrated pH meter or narrow-range pH indicator paper with a resolution not greater than ± 0.5 Standard Units.

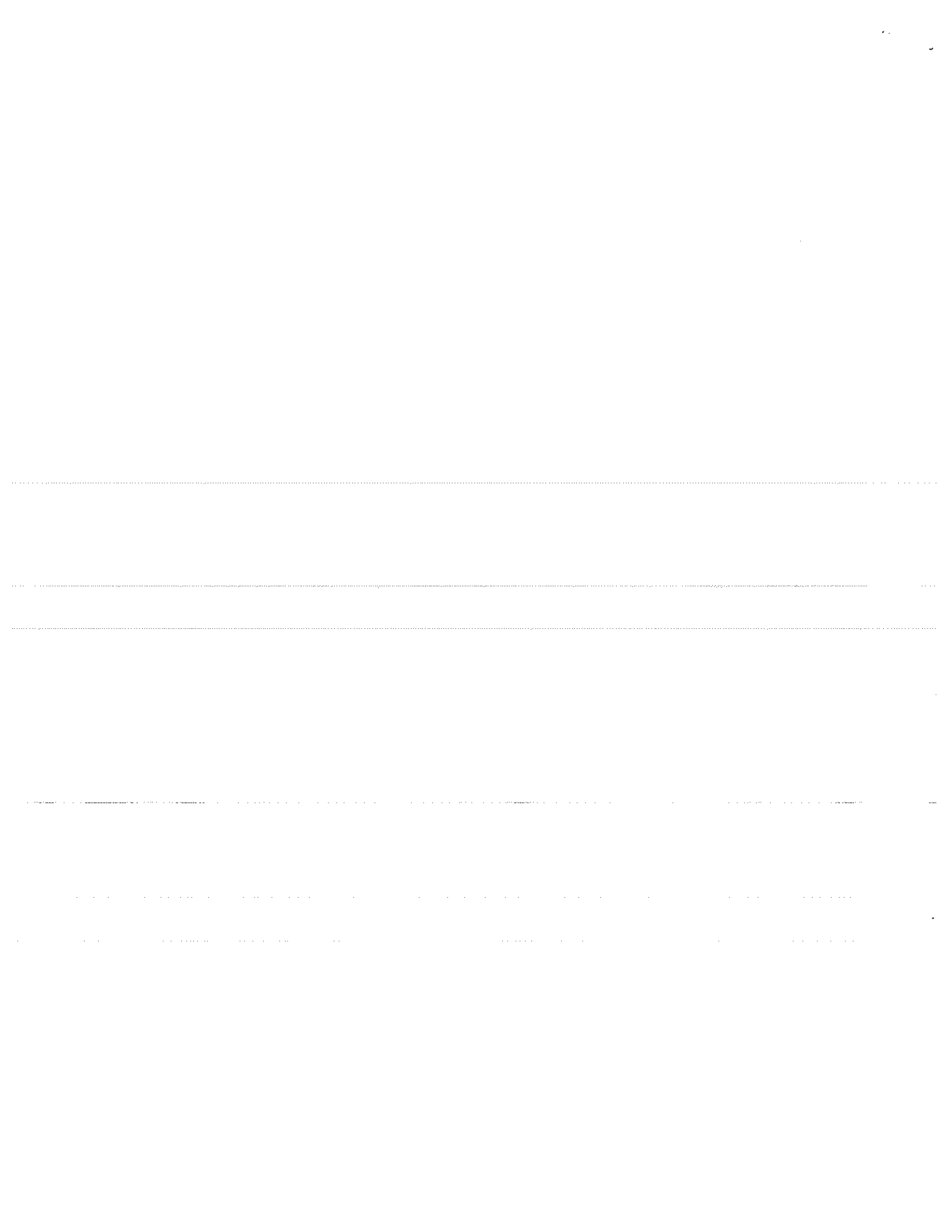
Industry-Specific Benchmarks and Sampling Requirements (Condition S5, Table 3)

Parameter	Units	Benchmark Value	Analytical Method	Laboratory Quantitation Level ¹
Chemical Oxygen Demand (COD), Total	mg/L	120	SM 5220-D	10
Total Suspended Solids (TSS)	mg/L	100	SM 2540 D	5

¹The Permittee shall ensure laboratory results comply with the quantitation level (QL) specified in the table. However, if an alternate method from 40 CFR Part 136 is sufficient to produce measurable results in the sample, the Permittee may use that method for analysis. If the Permittee uses an alternative method it must report the test method and QL on the discharge monitoring report.

Additional Sampling

Ecology may have established site-specific sampling requirements in addition to those contained in the ISGP (Administrative Order, permit modification, etc.). These additional requirements are not addressed in this summary.

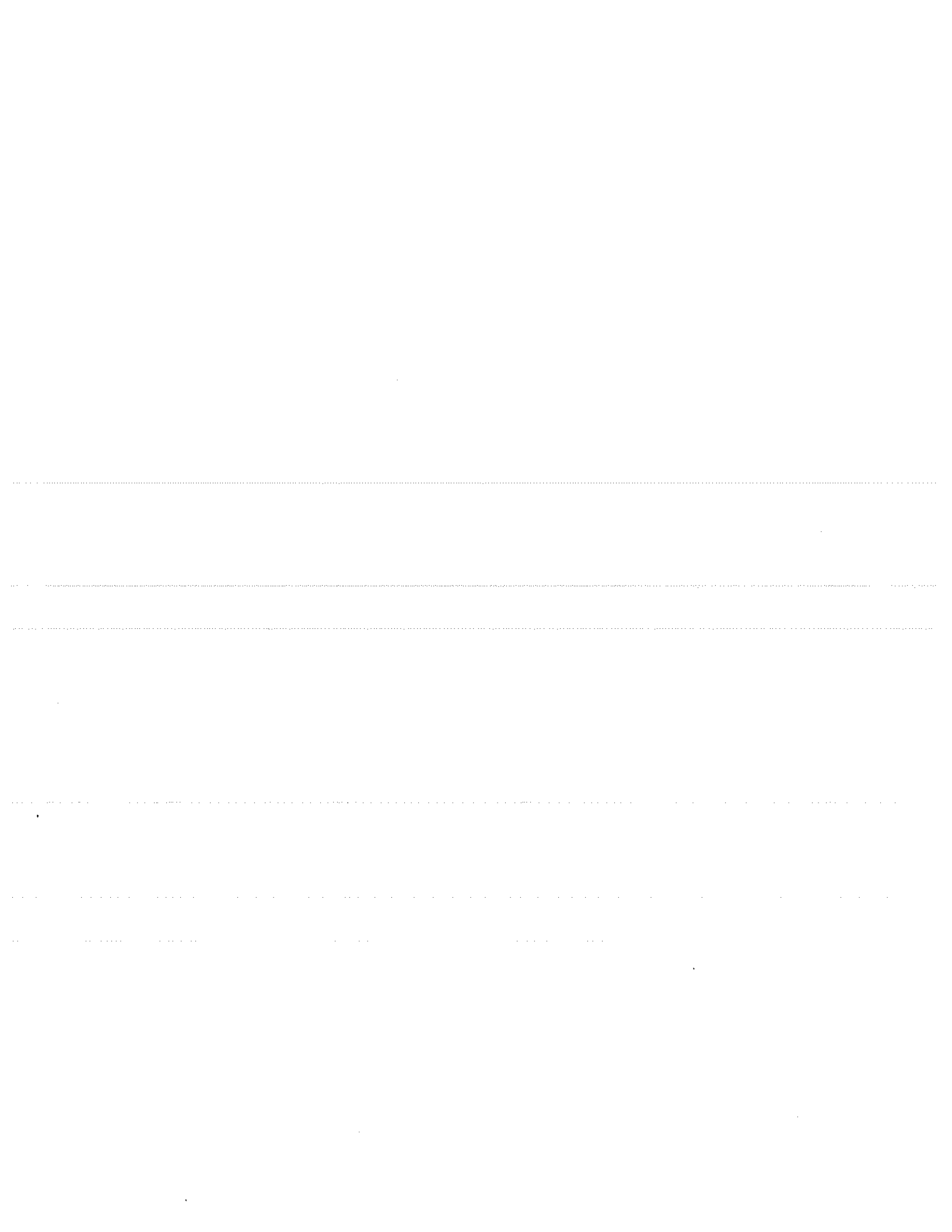


ATTACHMENT D

Notice of Intent

For Coverage Under the January 2015 ISGP

Homefire Prest Logs Ltd.





Notice of Intent
Industrial Stormwater General Permit

NOI Version: 1

Application Type: ☐ New ☒ Renewal

Permit Number: WAR125508

Application Id: 2236

I. Contact Information

Permittee		
Honorific: Ms.	First Name: Virginia	Last Name: Hermanson
Company Name: Homefire Prest Logs Ltd.	Title: Vice President	
Mailing Address: 6925 Salashan Pkwy		
City: Ferndale	State: WA	Zip Code: 98248-8314
Email: info@homefirelogs.com		
Business Phone: 360-366-2200	Fax:	Cell Phone:
UBI Number: 208880626		
Billing Contact		
Honorific:	First Name: Teresa	Last Name: Weston
Company Name: Home Fire Prest Logs	Title: controller	
Mailing Address: 6925 Salashan Pkwy		
City: Ferndale	State: WA	Zip Code: 98248-8314
Email: tweston@homefirelogs.com		
Business Phone: 360-366-2200	Fax:	Cell Phone:
UBI Number:		
Site Contact		
Honorific:	First Name: Clayton	Last Name: Hermanson
Company Name: Home Fire Prest Logs	Title: Operations manager	
Mailing Address: 6925 Salashan Pkwy		
City: Ferndale	State: WA	Zip Code: 98248-8314
Email: info@homefirelogs.com		
Business Phone: 360-366-2200	Fax: 360-366-2223	Cell Phone: 360-366-2200
UBI Number: 208880626		

II. Facility Information

Facility Name: Homefire Prest Logs

Street Address: 6925 Salashan Pkwy

City: Ferndale **County:** Whatcom **Zip Code:** 98248

Latitude: 48.8945536876618 **Longitude:** -122.6107791033

Size of Site: 3.5 acres **Date facility began or will begin operation:**

List all North American Industry Classification System (NAICS) and Standard Industrial Classification (SIC) codes to cover all industrial activities performed at your facility.

NAICS/SIC Code	Description	Is Primary
SIC 2499		Yes
NAICS 3219		Yes

Type or Nature of Industrial Activities:

manufacturer of 100% wood fire logs

☐ Is this facility a Hazardous Waste Treatment, Storage, and Disposal (TSD) facility regulated under Chapter 17-303 WAC?

For Airport Facilities:

☐ At your airport, do you as a single permittee, or a combination of permitted facilities, use more than 100,000 gallons of glycol-based deicing chemicals and/or 100 tons or more of urea on an average annual basis?

☐ Does your airport have 1,000 or more annual jet departures ("non-propeller aircraft")?

☐ Does the facility discharge wastewater associated with airfield pavement deicing with stormwater?

☐ Do you use urea-containing deicers?

☐ Does your airport meet the definition of a new source ("new airports")?

☐ Does (will) the airport have 10,000 or more annual departures?

☐ Is the airport located in a cold climate zone?

III. Other Permits/Registration

WAR125508

IV. Discharge/Receiving Water

Conveyance System

If you discharge to a municipal stormwater system or other stormwater conveyance system (e.g. Kent stormwater drainage system, roadside ditch), identify the system by name or if unnamed, by other identifier (e.g., 145th street ditch)

roadside ditch Salashan Parkway

Location of Discharge into Receiving Water (Outfall)

Outfall Number	Outfall Description	Surface Waterbody Name	Outfall Type	Latitude	Longitude
002	002	median	Surface Water Body	48.894554	-122.610779

Location of Discharge Location (Sampling/Monitoring Point)

Monitoring Point Code	Monitoring Point Name	Monitoring Point Type	Outfall Number	Active	Latitude	Longitude
001	001	Stormwater	002	Yes	48.894554	-122.610779

V. State Environmental Policy Act (SEPA)

This Notice of Intent (NOI) is incomplete and cannot be approved until the applicable SEPA requirements under Chapter 197-11 WAC are met.

SEPA and Public Notice sections apply only to facilities that began operations after January 1, 2015. If the facility began operations before this date, these sections do not need to be filled out.

Who is the SEPA lead agency on your site?

Has the SEPA lead agency issued a final decision on your checklist? ☐ Yes ☐ No ☐ Exempt

If No: The NOI is incomplete. Ecology will hold the application until a final SEPA decision is made or the Construction Stormwater NOI public comment period ends, whichever is later. You must notify Ecology once the lead agency has issued a determination.

If Yes: Type of SEPA decision issued:

Date of final SEPA decision:

Date when all SEPA-related comment & appeal periods are exhausted:

If Exempt:

- ☐ Watershed Restoration & Fish Habitat Enhancement Exemption (RCW 43.21C.0382).
- ☐ Infill Development Exemption (RCW 43.21C.229).
- ☐ Planned Action Exemption (RCW 43.21C.031).
- ☐ Categorical Exemption. Under what section of the SEPA Rule (WAC 197-11-800) is it exempt?

Section: _____

VI. Public Notice

Public Notice applies to facilities that began operations on or after January 1, 2015.

You must publish a public notice at least **once** a week for **two** consecutive weeks with **seven days** between publications, in at least a **single** newspaper of general circulation in the county in which the facility is located. Ecology cannot grant permit coverage sooner than the end of the 30-day public comment period, which begins on the date of the **second** public notice.

VII. Certification of Permittees

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Permittee Signature

5/14/2014

Date

ATTACHMENT E

Stormwater Pollution Prevention Plan

Homefire Prest Logs Ltd.



Stormwater Pollution Prevention Plan (SWPPP)
Industrial Permit WAR125508

For:

Home Fire Prest Logs
6925 Salashan Parkway
Ferndale, WA 98248
360-366-2200

SWPPP Contacts:

Virginia Hermanson or Clayton Hermanson

6925 Salashan Parkway
Ferndale, WA 98248
360-305-9767 or 360-305-9402
Fax 360-366-2223
Email: info@homefirelogs.com

SWPPP Preparation Date:

June 2015

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Table of Contents

1	Facility Description and Contact Information.....	1
1.1	Basic Facility Information	1
1.2	Contact Information and Responsible Parties.....	2
1.3	General Location Map.....	2
1.4	Stormwater Pollution Prevention Team	2
2	Facilities Assessment	3
2.1	Facilities Description	3
2.2	Industrial Activities.....	4
2.3	Materials Inventory and Associated Pollutants	8
3	Best Management Practices	11
3.1	Operational Source Control BMPs.....	11
3.2	Structural Source Control BMPs.....	18
3.3	Treatment BMPs	20
4	Sampling Plan	21
4.1	Water Quality Monitoring, Recordkeeping and Reporting.....	21
4.2	Training Program.....	22
4.3	SWPPP Revisions.....	22
5	SWPPP Certification.....	22
6	References.....	23

List of Tables

Table 1: Stormwater Pollution Prevention Team	3
Table 2: Facility Activities and Site Map Location	7
Table 3: Materials Exposed to Rainfall Runoff	9
Table 4: Industrial Activities and Potential Associated Pollutants	10

1 Facility Description and Contact Information

This document constitutes the Stormwater Pollution Prevention Plan (SWPPP) for Home Fire Prest Logs. The SWPPP was developed to meet the terms and conditions of the Industrial Stormwater General Permit, WAR125508, issued for the Home Fire Prest Logs industrial site by the Department of Ecology under the National Pollutant Discharge Elimination System (NPDES). Section S3 of this permit requires Home Fire to develop and implement a SWPPP for the site. The permit stipulates that the plan identify operational, structural, and treatment Best Management Practices (BMPs). Inspections and periodic visual observation of discharges from the facilities are required to evaluate the effectiveness of the BMPs.

1.1 Basic Facility Information

This SWPPP pertains to activities at the Home Fire Prest Logs site located at:

Home Fire Prest Logs
6925 Salashan Parkway
Ferndale, WA 98248

Latitude: 48.894401 N
Longitude: 122.610441 W

Estimated area of industrial activity exposed to stormwater: 2.36 acres

Receiving water body: California Creek

No discharge is conveyed into a municipal stormwater conveyance system per se. Runoff from catchbasins on the north and east side drain via private pipes to a grassy swale along Salashan Parkway then is piped under the driveway to California Creek. The west side of the site drains to a private stormwater pond facility operated by COPAC, Inc. Home Fire Prest Logs and other operations in the area contribute to a maintenance fund that COPAC manages.

SIC code: 2499

A copy of this SWPPP will be kept at the Office on site and appropriate sections will be copied and posted in the warehouse for staff review of good housekeeping practices and operational, structural, and treatment Best Management Practices (BMPs)..

1.2 Contact Information and Responsible Parties

Facility Operators/ Owners and SWPPP contacts:

Virginia Hermanson or Clayton Hermanson

6925 Salashan Parkway

Ferndale, WA 98248

360-366-2200

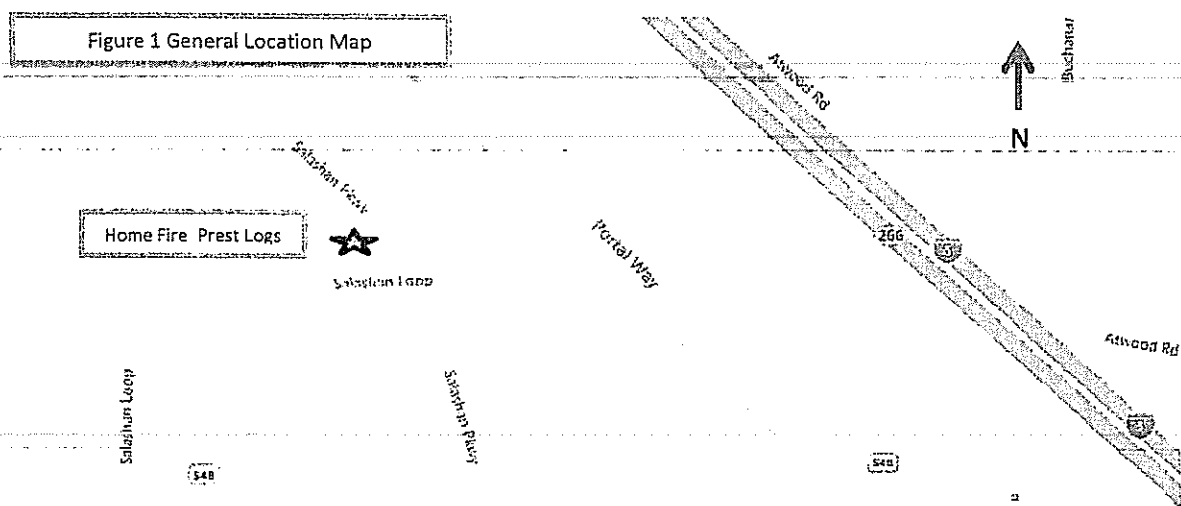
360-305-9767 or 360-305-9402

Fax 360-366-2223

Email: info@homefirelogs.com

1.3 General Location Map

The General location map is depicted in Figure 1. The site map features are shown on Figure 2a, stormwater drainage patterns, and Figure 2b, industrial activity areas.



1.4 Stormwater Pollution Prevention Team

Home Fire Prest Logs has developed a stormwater pollution prevention team (Table 1) that is responsible for overseeing the implementation of this plan and reviewing and updating the plan if any substantial changes are made to the site and/or operations.

Table 1: Stormwater Pollution Prevention Team

Staff Titles	Individual Responsibilities
Vice President	<ul style="list-style-type: none">• Coordinates and implements the Industrial stormwater program• Initiates revisions to the SWPPP if necessary• Implements training program• Performs SWPPP inspections• Collects water quality samples• Submits annual and quarterly reports• Maintains SWPPP within facility
Operations Manager	<ul style="list-style-type: none">• Assists in coordinating and implementing the industrial stormwater program,• Implements BMPs for equipment storage area, liquid and solid waste storage areas• Oversees inspections and cleaning of stormwater system

2 Facilities Assessment

2.1 Facilities Description

Home Fire Prest Logs is a manufacturer of 100% wood fire logs through densification of clean sawdust. The site occupies approximately 3.5 acres on Salashan Parkway in Grandview Light Industrial Park, Ferndale, WA; of the 3.5 acres approximately 2.36 acres are exposed to rainfall. Regular hours of operation are Monday through Friday from 8:00-4:00.

The general layout of the facility consists of a parking lot, a loading dock, an unloading dock, a fully enclosed pre-processing system, a warehouse that houses the densification machine, conveyor belts, packaging area, office, and machine and welding shops. Stormwater runoff from the site includes runoff from the roof of the warehouse, parking lot, stockpiles, loading docks and trucks in the process of being unloaded.

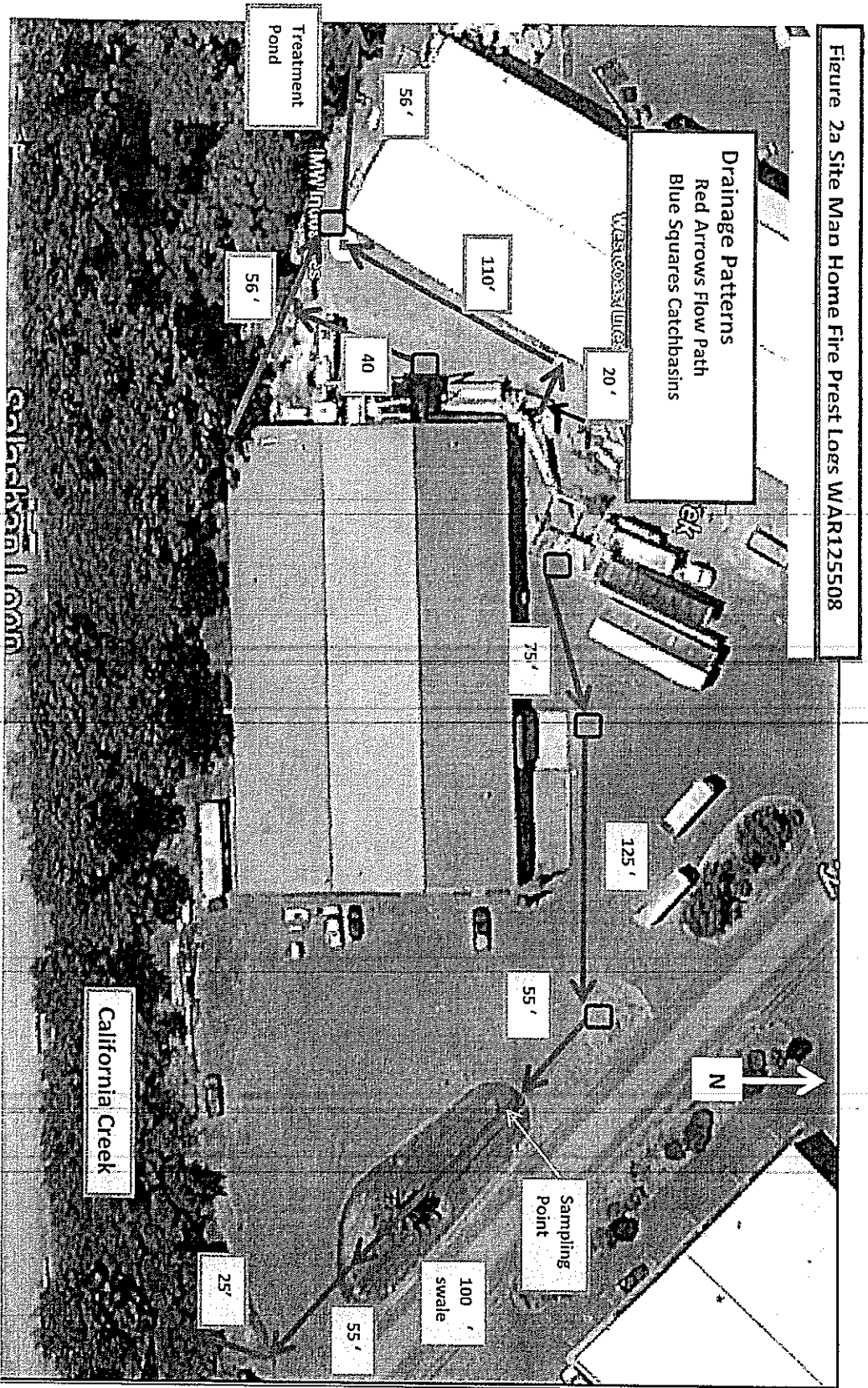
An important aspect of stormwater pollution prevention is to limit the amount of stormwater running on to the site. The site is relatively flat as is the surrounding drainage area therefore the likelihood of stormwater run-on from offsite is low. Stormwater generated from the back of the warehouse (west end of site) and two rear roof downspouts enters catchbasins and is conveyed into a private stormwater pond operated by COPAC, Inc. Stormwater from the rest of the site flows to catchbasins or sheet flows east to a grassy swale along Salashan Parkway and is piped to California Creek. Specific site drainage is noted on Figure 2a as red arrows.

2.2 Industrial Activities

Sawdust is delivered in trucks to the unloading dock staging area, then chain dragged from the trailers into an enclosed conveyor belt through a rotary drier to a cyclone. From there the sawdust goes through an after filter into a metering bin and is delivered via a screw conveyor to the log densification and packing machine in the warehouse. The process is completely enclosed.

The bio-extruder machine pressurizes the sawdust to the core of the log, which causes it to heat to nearly 300 degrees. This temperature melts the natural lignin in the wood particles, and the pressure causes them to bind tightly together. The log is then passed through a cooling tube and is slowly ejected as new material forms in behind it. When the protruding log is of desired length it is automatically cut off and a conveyor moves it to the packaging area. Pallets of shrink wrapped prest logs are forklifted into trucks and delivered offsite to retailers.

Areas where industrial activities occur on the site were noted and mapped on Figure 2b. Table 2 describes the activities that occur in each of the designated areas. Areas labelled with an O in front are located outside while areas beginning with a W are inside the warehouse.



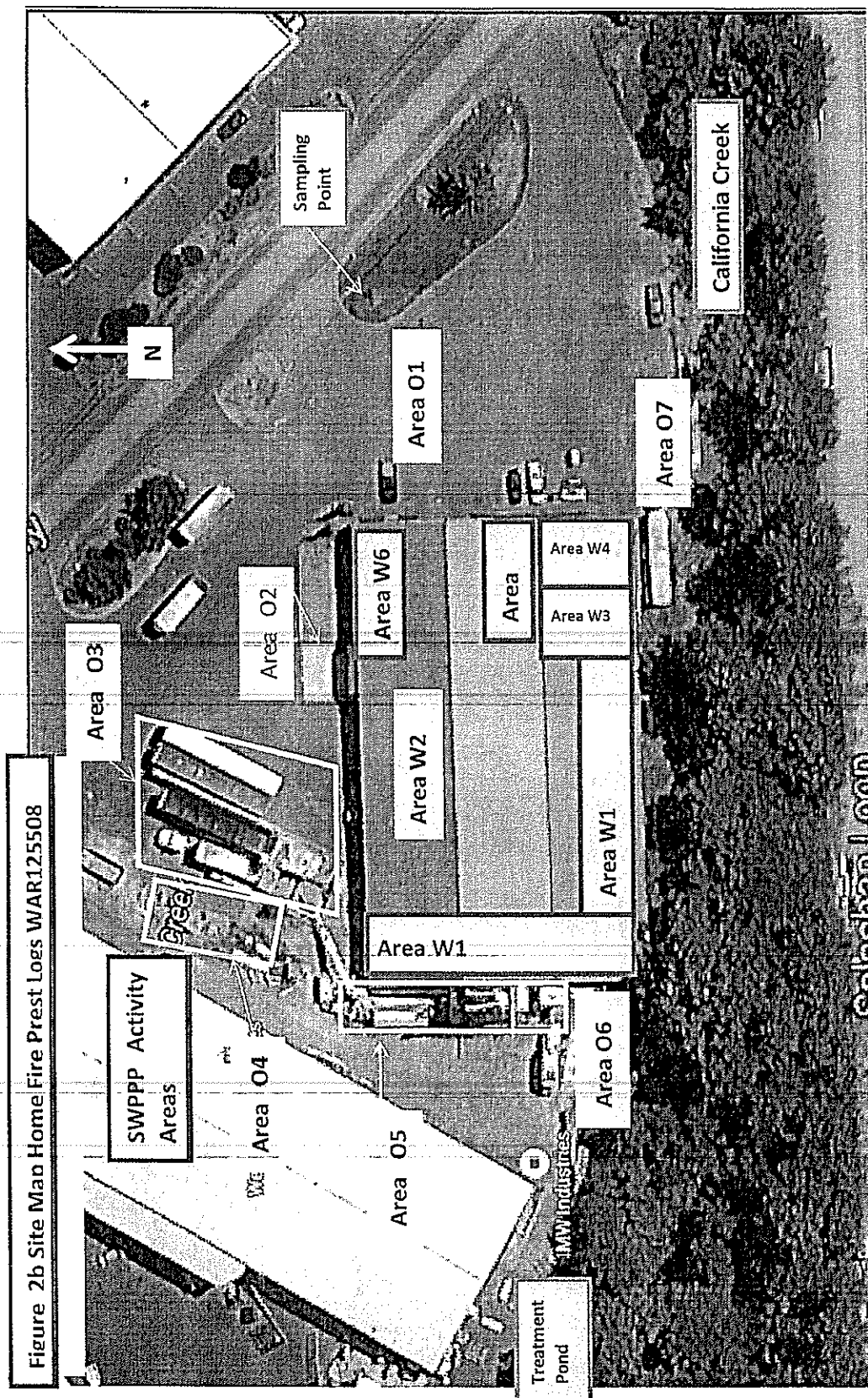


Table 2: Facility Activities and Site Map Location

Facility Areas	Description of Activities performed within Area	Site Map Number
<i>Outside Areas</i>		
Parking lot	Vehicles parked on pavement outside not in unloading area. It is used only during regular business hours, but at times vehicles or trucks are stored there temporarily.	Area –O1
Loading Dock	Prest logs on wrapped pallets are loaded onto trucks for delivery to retailers	Area - O2
Unloading Dock	Sawdust is delivered in trailers and unloaded in a bermed dock via a chain drag to a conveyor belt	Area –O3
Solid Materials Storage	Several locations are used for storing scrap metals and temporarily storing materials for repair or recycle. A covered dumpster is located in Area O7 and a propane tank	Area- O4,O6,O7
Pre- Processing Equipment	The completely enclosed pre-processing system includes a rotary drier, a hydraulic pump, a cyclone, an after filter and a metering bin all located on a concrete slab outside the warehouse. Finos from the after filter are stored in an enclosed bin and are hauled away by Scrap It	Area – O5
<i>Warehouse Areas</i>		
Production End of Warehouse	Densification machine and conveyor belts located at west end of warehouse. Storage of byproducts from the densification process -- bins of sawdust for garbage and scraps of logs for recycling by SSC	Area –W1
Warehouse	Packaging and storage of prest logs for delivery	Area –W2
Machine Shop	All required machine work occurs in the machine shop. No storage of liquids	Area – W3
Welding Shop	All required welding occurs in the warehouse shop. A few 5 gallon buckets of oil are stored	Area – W4
Equipment Storage	Corner of warehouse is used for equipment storage and infrequent vehicle maintenance. All vehicle and equipment maintenance is conducted inside the bay. Used sealed oil drums are stored temporarily on pallets prior to disposal	Area - W5
Administrative Office	Business administration and recordkeeping	Area –W6

2.3 Materials Inventory and Associated Pollutants

Materials on site include sawdust in covered trailers, sawdust spillage in bermed unloading doc, both fine grained sawdust and chips of prest logs in bins in the warehouse, and vehicles that are temporarily stored in the parking lot. In addition, stockpiles of scrap metal are located in several areas. There is one enclosed dumpster for dust and fines extracted by the after filter and a covered garbage dumpster on site. A limited amount of oil, gas, grease, diesel and hydraulic fluid is stored in the warehouse. Waste oil is also stored in the warehouse. The warehouse roof is galvanized so roof runoff is considered a potential source of zinc. Only outside materials are exposed to rain. There are no drains located in the warehouse.

Table 3: Materials Exposed to Rainfall Runoff

Materials stored at facility	Map Location Area	Description of Disposal	Period of Exposure	Method of
Vehicles parked outside not in unloading area in parking lot	Area - O1	Periodically – it is used only during regular business hours, but at times vehicles or trucks are stored there temporarily.		
Trailers with delivered sawdust load	Area - O3	Periodically – unloading dock is bermed and trailers are all covered but some sawdust does get wind blown		
Sawdust spillage in unloading dock	Area - O3	Periodically – unloading dock is bermed and swept and vacuumed daily but some sawdust does get wind blown		
Scrap metal stockpiles - Pipes, culverts other misc. drainage equipment	Area- O4,O6, O7	Continuous during storage periods – stored in stockpiles and used as needed and recycled periodically at Z's		
Dumpster for fines extruded by the after filter	Area- O5	Infrequently - dumpster is completely enclosed and hauled away as needed by Scrap It		
Garbage Dumpster	Area - O7	Infrequently - dumpster is covered and emptied as needed serviced by SSC		

Table 4: Industrial Activities and Potential Associated Pollutants

Activity	Associated Pollutant Potential to Stormwater ¹							
	Hydrocarbons	Pesticides	Oils & Greases	Nutrients	Metals	Total suspended solids	Bacteria	COD/BOD ²
Vehicle Storage	✓		✓		✓	✓		
Storage of Scrap and Recycled Materials	✓	✓	✓		✓	✓		✓
Storage of Liquid Materials	✓	✓	✓	✓	✓			✓
Storage of Solid Materials				✓	✓	✓		✓
Sawdust				✓		✓		✓
Parking Lot Maintenance	✓				✓	✓		
¹ Adapted from King County pollution prevention manual and Center for Watershed Protection Manual 9 Municipal Pollution Prevention/ Good Housekeeping Practices ² COD/BOD = Chemical Oxygen Demand and Biological Oxygen Demand								

3 Best Management Practices

3.1 Operational Source Control BMPs

Operational source control BMPs are non-structural practices that occur during normal operations at the Home Fire Prest Logs industrial site. These practices that prevent or reduce pollutants from entering stormwater can include but are not limited to promoting good housekeeping practices and using preventative maintenance such as performing routine inspection and maintenance for the stormwater drainage system, spill prevention, response, and cleanup.

Home Fire Prest Logs currently uses many good housekeeping practices and has many operational BMPs already in place. Below are bullets outlining Industry- Specific source control or BMPs that are applicable to the Prest Log operation followed by a table of current practices and recommended additional practices. Comments are made in red italics in parentheses as appropriate if a BMP is not applicable.

APPLICABLE PERMIT LANGUAGE

Mandatory Operational Source Control BMPs required by condition S3. of the Industrial Stormwater General Permit:

Good Housekeeping:

- Vacuum paved surfaces with a vacuum sweeper (or a sweeper with a vacuum attachment) to remove accumulated pollutants a minimum of once per quarter.
- Identify and control all on-site sources of dust to minimize stormwater contamination from the deposition of dust on areas exposed to precipitation.
- Inspect and maintain bag houses monthly to prevent the escape of dust from the system. Immediately remove any accumulated dust at the base of exterior bag houses. (After filter)
- Keep all dumpsters under cover or fit with a lid that must remain closed when not in use.

CATEGORIES OF APPLICABLE BMPs

Operational Source Control BMPs for Dust Control at Manufacturing Areas:

- Clean, as needed, power material handling equipment and vehicles that can be sources of stormwater pollutants, to remove accumulated dust and residue.
- Regularly sweep dust accumulation areas that can contaminate stormwater. Sweeping should be conducted using vacuum filter equipment to minimize dust generation and to ensure optimal dust removal.

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> Minimal dust is generated and wind-blown sawdust is swept and vacuumed daily as part of cleaning routine All surfaces surrounding the unloading zone are swept and vacuumed daily and the small pile is periodically cleaned up Bay Services is retained annually to sweep and vacuum with their vactruck 	<ul style="list-style-type: none"> Encourage truck companies and drivers to clean their trucks and secure the covers as spillage from trailers that remains on site becomes Home Fire's responsibility Consider using Bay Services more often if needed Immediately remove any accumulated dust at the base of after filter

Operational Source Control BMPs for Loading and Unloading Areas for Liquid or Solid Material:

All Loading/Unloading Areas:

- A significant amount of debris can accumulate at outside, uncovered loading/unloading areas. Sweep these surfaces frequently to remove material that could otherwise be washed off by stormwater. Sweep outside areas that are covered for a period of time by containers, logs, or other material after the areas are cleared.
- Place drip pans, or other appropriate temporary containment device, at locations where leaks or spills may occur such as hose connections, hose reels and filler nozzles. Drip pans shall always be used when making and breaking connections. Check loading/unloading equipment such as valves, pumps, flanges, and connections regularly for leaks and repair as needed.

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> Unloading of sawdust is done from a bermed loading dock. Delivered trailers are covered at all times. All surfaces surrounding the unloading zone are swept and vacuumed daily and the small pile is periodically cleaned up Bay Services is retained annually to sweep and vacuum with their vactruck Loading is not a potential pollutant source since all prest logs are shrink-wrapped and on pallets forklifted into delivery truck Drip pans/ cardboard is used when making and breaking connections 	<ul style="list-style-type: none"> Encourage truck companies and drivers to clean their trucks. Spillage from their trailers that remains on site becomes Home Fire's responsibility Consider using Bay Services more often if needed in the unloading dock Area - O3

Operational Source Control BMPs for Maintenance and Repair of Vehicles and Equipment:

- Inspect for leaks all incoming vehicles, parts, and equipment stored temporarily outside.
- Use drip pans or containers under parts or vehicles that drip or that are likely to drip liquids, such as during dismantling of liquid containing parts or removal or transfer of liquids.
- Remove batteries and liquids from vehicles and equipment in designated areas designed to prevent stormwater contamination. Store cracked batteries in a covered non-leaking secondary containment system.
- Empty oil and fuel filters before disposal. Provide for proper disposal of waste oil and fuel.
- Do not pour/convey washwater, liquid waste, or other pollutant into storm drains or to surface water. Check with the local sanitary sewer authority for approval to convey to a sanitary sewer.
- Do not connect maintenance and repair shop floor drains to storm drains or to surface water. *(No drains in warehouse)* To allow for snowmelt during the winter a drainage trench with a sump for particulate collection can be installed and used only for draining the snowmelt and not for discharging any vehicular or shop pollutants. *(N/A)*

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> • Vehicle and equipment maintenance is very infrequent and performed inside the warehouse • Warehouse is swept and vacuumed daily; nothing is hosed down • Proper recycling/ disposal of used or spilled fluids (e.g. oil, grease, diesel, hydraulic fluid) • There are no drains in the warehouse except for the bathroom and lunch room which goes to sanitary sewer 	<ul style="list-style-type: none"> • Label location of spill response kits

Operational Source Control BMPs for Maintenance of Stormwater Drainage and Treatment Systems:

- Inspect and clean treatment BMPs, conveyance systems, and catch basins as needed, and determine whether improvements in O & M are needed.
- Promptly repair any deterioration threatening the structural integrity of the facilities. These include replacement of clean-out gates, catch basin lids, and rock in emergency spillways.
- Ensure that storm sewer capacities are not exceeded and that heavy sediment discharges to the sewer system are prevented. *(N/A)*
- Regularly remove debris and sludge from BMPs used for peak-rate control, treatment, etc. and discharge to a sanitary sewer if approved by the sewer authority, or truck to a local or state government approved disposal site. *(N/A)*
- Clean catch basins when the depth of deposits reaches 60 percent of the sump depth as measured from the bottom of basin to the invert of the lowest pipe into or out of the basin.

However, in no case should there be less than six inches clearance from the debris surface to the invert of the lowest pipe. Some catch basins (for example, WSDOT Type 1L basins) may have as little as 12 inches sediment storage below the invert. These catch basins will need more frequent inspection and cleaning to prevent scouring. Where these catch basins are part of a stormwater collection and treatment system, the system owner/operator may choose to concentrate maintenance efforts on downstream control devices as part of a systems approach.

- Clean woody debris in a catch basin as frequently as needed to ensure proper operation of the catch basin.
- Post warning signs; "Dump No Waste - Drains to Ground Water," "Streams," "Lakes," or emboss on or adjacent to all storm drain inlets where practical. *(Not practical)*
- Disposal of sediments and liquids from the catch basins must comply with "Recommendations for Management of Street Wastes" described in Appendix IV-G of this volume.
- Operational Source Control BMPs for Soil Erosion and Sediment Control at Industrial Sites, Storage of Liquid, Food Waste, or Dangerous Waste Containers, Spills of Oil and Hazardous Substances, Illicit Connections to Storm Drains, Urban Streets.

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> • Catch basins are lined with Sentinel sacks which are cleaned regularly • Bay Services is retained annually to clean the catchbasins and flush the stormdrain system. They are responsible for proper disposal of sediments and liquids 	<ul style="list-style-type: none"> • Clean catchbasins when dry hand dig built up sediment. Because quantities are below threshold limit disposal will not be regulated • Clean Sentinel sacks more frequently particularly the catchbasin in the bermed unloading dock

Operational Source Control BMPs for Parking and Storage of Vehicles and Equipment:

- If washing of a parking lot is conducted, discharge the washwater to a sanitary sewer, if allowed by the local sewer authority, or other approved wastewater treatment system, or collect it for off-site disposal.
- Do not hose down the area to a storm drain or to a receiving waterbody. Sweep parking lots, storage areas, and driveways, regularly to collect dirt, waste, and debris.

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> • Most vehicles are not stored overnight. Trailers are periodically stored on the pavement. • Vehicles stored outdoors are inspected periodically for leaks and drip pans are used if necessary 	<ul style="list-style-type: none"> • Encourage truck companies and drivers to clean their trucks. Spillage from their trailers that remains on site becomes Home Fire's responsibility • Continue to inspect stored vehicles for oil leaks

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> Parking vehicle storage area is not hosed down Bay Services is retained annually to sweep / vacuum the parking lot with their vactruck and disposes of the waste off-site 	

Operational Source Control BMPs for Roof/Building Drains at Manufacturing and Commercial Buildings:

- If leachates and/or emissions from buildings are suspected sources of stormwater pollutants, then sample and analyze the stormwater draining from the building.
- If a roof/building stormwater pollutant source is identified, implement appropriate source control measures such as air pollution control equipment, selection of materials, painting galvanized surfaces, operational changes, material recycle, process changes, etc.

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> Stormwater draining from warehouse roof has been sampled and analyzed 	<ul style="list-style-type: none"> Add additional downspouts to treatment Grattix filters will be installed at all warehouse roof downspouts to treat roof runoff and will need to be maintained

Operational Source Control BMPs for Spills of Oil and Hazardous Substances:

- Prepare an Emergency Spill Control Plan (SCP), which includes:
 - A description of the facility including the owner's name and address;
 - The nature of the activity at the facility;
 - The general types of chemicals used or stored at the facility;
 - A site plan showing the location of storage areas for chemicals, the locations of storm drains, the areas draining to them, and the location and description of any devices to stop spills from leaving the site such as positive control valves; *(All of the above bullets are included in this SWPPP)*
 - Cleanup procedures;
 - Notification procedures to be used in the event of a spill, such as notifying key personnel. Agencies such as Ecology, local fire department, Washington State Patrol, and the local Sewer Authority, shall be notified;
 - The name of the designated person with overall spill cleanup and notification responsibility;

- Train key personnel in the implementation of the Emergency SCP. Prepare a summary of the plan and post it at appropriate points in the building, identifying the spill cleanup coordinators, location of cleanup kits, and phone numbers of regulatory agencies to be contacted in the event of a spill;
- Update the SCP regularly;
- Immediately notify Ecology and the local Sewer Authority if a spill may reach sanitary or storm sewers, ground water, or surface water, in accordance with federal and Ecology spill reporting requirements;
- Immediately clean up spills. Do not use emulsifiers for cleanup unless an appropriate disposal method for the resulting oily wastewater is implemented. Absorbent material shall not be washed down a floor drain or storm sewer; and,
- Locate emergency spill containment and cleanup kit(s) in high potential spill areas. The contents of the kit shall be appropriate for the type and quantities of chemical liquids stored at the facility.

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> • Spill supplies are kept in the warehouse • Spills are cleaned using dry techniques -- sawdust is an effective absorbent • Sawdust used as an absorbent is disposed of properly in the dumpster 	<ul style="list-style-type: none"> • Augment spill response plan and clarify notification protocol • Post a summary of clean up and notification procedures in the warehouse and machine and welding shops • Purchase and label the location of spill response kits • Train employees

Operational Source Control BMPs for Storage of Liquid, Food Waste, or Dangerous Waste Containers:

- Place tight-fitting lids on all containers.
- Place drip pans beneath all mounted container taps and at all potential drip and spill locations during filling and unloading of containers.
- Inspect container storage areas regularly for corrosion, structural failure, spills, leaks, overfills, and failure of piping systems. Check containers daily for leaks/spills. Replace containers, and replace and tighten bungs in drums as needed.
- Businesses accumulating Dangerous Wastes that do not contain free liquids need only to store these wastes in a sloped designated area with the containers elevated or otherwise protected from storm water runoff.
- Drums stored in an area where unauthorized persons may gain access must be secured in a manner that prevents accidental spillage, pilferage, or any unauthorized use.

- If the material is a Dangerous Waste, the business owner must comply with any additional Ecology requirements as required.
- Storage of reactive, ignitable, or flammable liquids must comply with the Uniform Fire Code.
- Cover dumpsters, or keep them under cover such as a lean-to, to prevent the entry of stormwater. Replace or repair leaking garbage dumpsters.
- Drain dumpsters and/or dumpster pads to sanitary sewer. Keep dumpster lids closed. Install waterproof liners.

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> • There is minimal liquid storage and it is all kept in the warehouse not exposed to rain. • There are no drains in the warehouse • Waste oil is stored in Area W-6 in closed 55 gallon drums on pallets. • All drums storing liquids are covered • The fluids are properly disposed of by Emerald. • Dumpster is covered and emptied as needed • Sawdust and small amount of diesel are only hazardous materials on site 	<ul style="list-style-type: none"> • Clearly label all containers that contain potential pollutants • Secondary containment should be provided for the waste oil in Area W-6 • Recycle empty 55 gallon drums if not needed • Acquire dust covers for waste oil drums • Secondary containment should be provided for the stored oil in the welding shop Area W-5

Operational Source Control BMPs for Storage or Transfer (Outside) of Solid Raw Materials, By-Products, or Finished Products:

- Do not hose down the contained stockpile area to a storm drain or a conveyance to a storm drain or to a receiving water.

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> • Most solid materials are stored inside or under cover except periodically a small pile of sawdust spillage collects in the deepest area of the bermed unloading zone • Sawdust spillage is shoveled into the chain drag daily • All surfaces surrounding the unloading zone are swept and vacuumed daily and the small pile is periodically cleaned up • Proper recycling/ disposal of densification machine spoils • No stockpile areas are hosed down • Loading dock is not a pollutant source. Shrink-wrapped pallets of prest logs are forklifted into delivery semi-trucks 	<ul style="list-style-type: none"> • Encourage truck companies and drivers to clean their trucks. Spillage from their trailers that remains on site becomes Home Fire's responsibility • Recycle scrap metal more frequently • Minimize stockpiles in Areas O4,O6 and O7

3.2 Structural Source Control BMPs

Structural source control BMPs to prevent pollutants from entering stormwater typically include covering pollutant sources, separating run-on from pollutant source, and containing and directing contaminated water to treatment.

Below are bullets outlining Industry- Specific source control or BMPs that are applicable to the Prest Log operation followed by a table of current practices and recommended additional practices. Comments are made in red italics in parentheses as appropriate if a BMP is not applicable.

APPLICABLE PERMIT LANGUAGE

Mandatory Structural Source Control BMPs required by condition S3. of the Industrial Stormwater General Permit:

- Use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away from manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations).
- Perform all cleaning operations indoors, under cover, or in bermed areas that prevent stormwater runoff and run-on and also that capture any overspray.
- Ensure that all washwater drains to a collection system that directs the washwater to further treatment or storage and not to the stormwater drainage system.

CATEGORIES OF APPLICABLE BMPS

Structural Source Control BMPs for Loading and Unloading Areas for Liquid or Solid Material:

All Loading/ Unloading Areas:

- Consistent with Uniform Fire Code requirements and to the extent practicable, conduct unloading or loading of solids and liquids in a manufacturing building, under a roof, or lean-to, or other appropriate cover.
- Berm, dike, and/or slope the loading/unloading area to prevent run-on of stormwater and to prevent the runoff or loss of any spilled material from the area.
- Large loading areas frequently are not curbed along the shoreline. As a result, stormwater passes directly off the paved surface into surface water. Place curbs along the edge, or slope the edge such that the stormwater can flow to an internal storm drain system that leads to an approved treatment BMP. (N/A)
- Pave and slope loading/unloading areas to prevent the pooling of water. The use of catch basins and drain lines within the interior of the paved area must be minimized as they will frequently be covered by material, or they should be placed in designated "alleyways" that are not covered by material, containers or equipment.

Loading and Unloading Docks:

- Install/maintain overhangs, or door skirts that enclose the trailer end to prevent contact with rainwater.
- Design the loading/unloading area with berms, sloping, etc. to prevent the run-on of stormwater.
- Retain on-site the necessary materials for rapid cleanup of spills.

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> • Unloading of wood waste is done from a bermed loading dock. Delivery trucks are covered at all times. • Unloading area is paved and sloped • Sawdust is on-site for rapid cleanup of spills • Loading is not a potential pollutant source since all prest logs are shrink wrapped and on pallets forklifted into delivery truck 	<ul style="list-style-type: none"> • Could consider covering the unloading dock with a pole building • Increase frequency of cleaning the Sentinel sack in the catchbasin in the unloading dock

Structural Source Control BMPs for Storage or Transfer (Outside) of Solid Raw Materials, By-Products, or Finished Products:

- Store in a building or paved and bermed covered area (include berm if needed)
- Place temporary plastic sheeting (polyethylene, polypropylene, hypalon, or equivalent) over the material.
- Pave the area and install a stormwater drainage system. Place curbs or berms along the perimeter of the area to prevent the run-on of uncontaminated stormwater and to collect and convey runoff to treatment. Slope the paved area in a manner that minimizes the contact between stormwater (e.g., pooling) and leachable materials in compost, logs, bark, wood chips, etc.
- For large stockpiles that cannot be covered, implement containment practices at the perimeter of the site and at any catch basins as needed to prevent erosion and discharge of the stockpiled material offsite or to a storm drain. Ensure that contaminated stormwater is not discharged directly to catch basins without conveying through a treatment BMP.

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> • Loading is not a potential pollutant source since all prest logs are shrink-wrapped and stored on pallets in the warehouse then forklifted into delivery trucks. 	<ul style="list-style-type: none"> • Consider recycling scrap metal more frequently and minimizing stockpiles

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> No finished products or by-products are stored outside. Scrap metal stockpiles are outside. 	

3.3 Treatment BMPs

Treatment BMPs are designed to remove pollutants from contaminated stormwater. Oil/ water separators, wetponds, biofiltration swales and constructed wetlands are some examples of treatment BMPs.

Below are bullets outlining Industry- Specific source control or BMPs that are applicable to the Prest Log operation followed by a table of current practices and recommended additional practices. Comments are made in red italics in parentheses as appropriate if a BMP is not applicable.

APPLICABLE PERMIT LANGUAGE

Mandatory Treatment BMPs required by condition S3. of the Industrial Stormwater General Permit:

- Employ oil/water separators, booms, skimmers or other methods to eliminate or minimize oil and grease contamination of stormwater discharges.
- Obtain Ecology approval before beginning construction/installation of all treatment BMPs that include the addition of chemicals to provide treatment.

CATEGORIES OF APPLICABLE BMPs

Treatment BMPs for Parking and Storage of Vehicles and Equipment:

- An oil removal system such as an API or CP oil and water separator, catch basin filter, or equivalent BMP, approved by the local jurisdiction, is applicable for parking lots meeting the threshold vehicle traffic intensity level of a high-use site.

A high-use site is:

- Subject to an expected average daily vehicle traffic (ADT) count equal to or greater than 100 vehicles per 1,000 square feet of gross building area; or
- Is subject to storage of a fleet of 25 or more diesel vehicles that are over 10 tons gross weight (trucks, buses, trains, heavy equipment, etc.). *(Not a high use site)*

Treatment BMPs for Storage of Liquid, Food Waste, or Dangerous Waste Containers:

- For contaminated stormwater in the containment area, connect the sump outlet to a sanitary sewer, if approved by the local Sewer Authority, or to appropriate treatment such as an API or CP oil/water separator, catch basin filter or other appropriate system (see Volume V). Equip the sump outlet with a normally closed valve to prevent the release of spilled or leaked liquids, especially flammables (compliance with Fire Codes), and dangerous liquids. This valve may be opened only for the conveyance of contaminated stormwater to treatment.
- Another option for discharge of contaminated stormwater is to pump it from a dead-end sump or catchment to a tank truck or other appropriate vehicle for off-site treatment and/or disposal.

Treatment BMPs for Storage or Transfer (Outside) of Solid Raw Materials, By-Products, or Finished Products:

- Convey contaminated stormwater from the stockpile area to a wet pond, wet vault, settling basin, media filter, or other appropriate treatment system depending on the contamination.

Current Good Housekeeping and Best Management Practices	Recommended Additional BMPs
<ul style="list-style-type: none"> • Loading is not a potential pollutant source since all prest logs are shrink-wrapped and stored on pallets in the warehouse then forklifted into delivery trucks. • No finished products or by-products are stored outside. • Scrap metal stockpiles are outside. Areas O-4 and O-6 are conveyed to a stormwater treatment facility 	<ul style="list-style-type: none"> • None at this time

4 Sampling Plan

4.1 Water Quality Monitoring, Recordkeeping and Reporting

Home Fire Prest Logs currently conducts water quality monitoring quarterly. The point of compliance sampling is at monitoring point code 001, located at the outfall (002) to the grassy swale as the stormwater exits the site; latitude 48.894554, longitude -122.610779 (see Figure 2a). General industrial parameters include Turbidity, pH, total Zinc, oil sheen, total Copper. Industry specific parameters of total COD and TSS are also collected monthly. In addition, one storm sample is collected annually during the first storm that occurs after October. A pH kit needs to be purchased and samples collected quarterly along with the other parameters. In addition, notes on

oil sheen need to be documented. Discharge Monitoring Reports (DMRs) are filed electronically through DOE's WQwebportal and copies are kept on site.

Monthly stormwater site inspections are conducted and kept on site available for review as requested. These help to evaluate how well the BMPs are operating and identify if corrective actions are necessary and at what level. Recordkeeping, scheduling and completion of noted corrective actions is kept on file and reported with the annual permit electronic filing each May. Cleaning of catch basins and drainage facilities occurs as needed also and as required, maintenance to any facility is scheduled and completed as soon as practicable. Bay Services is retained to clean the catch basins and flush the stormwater system annually.

4.2 Training Program

Home Fire Prest Logs will provide opportunities for staff training on stormwater pollution prevention.

4.3 SWPPP Revisions

SWPPP revisions and updates will occur if any substantial changes are made to the site and/or operations which could affect the quality of the stormwater runoff from the site.

5 SWPPP Certification

The SWPPP certification form can be found in Appendix A.

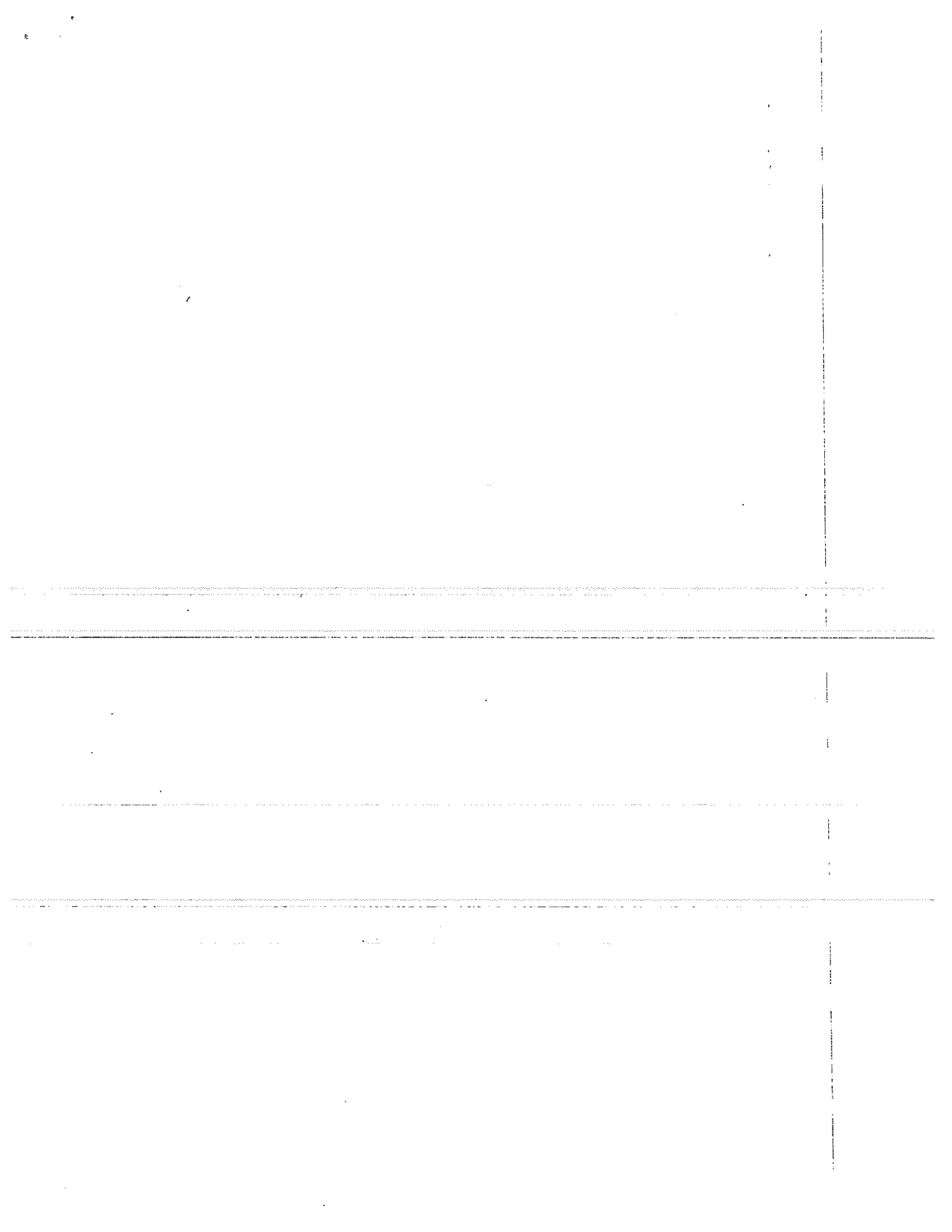
6 References

Department of Ecology, from DOE website. Industrial Stormwater General Permit. Stormwater Pollution Prevention Plan Template.

Department of Ecology, 2012. Stormwater Management Manual for Western Washington. Publication Numbers 12-10-030.

King County. January 2005. Stormwater Pollution Prevention Manual.

Novotney, M. and Winer, R. 2008. Municipal Pollution Prevention/ Good Housekeeping Practices Version 1.0. Center for Watershed Protection. Urban Subwatershed Restoration Manual No. 9.



In Case of a Spill

Initial Actions

1. Assess scene for safety hazards.
2. Notify business manager / supervisor / safety officer
3. **If dangerous or an emergency, call 911**
4. Wear personal protection equipment; Stop the flow if it is safe to do so.
5. If safe, contain the spill. Protect any drains / catch basins (by use of absorbents, booms or drain covers)
6. Make the required notifications. **(See numbers on reverse)**
7. Clean up spill if safe and within your level of training.
8. If necessary, contact a spill response contractor for additional resources.

NOTE: The Hazardous Waste Services Directory at <http://apps.ecy.wa.gov/hwsd/default.htm> lists businesses that help with dangerous waste, including spill contractors.

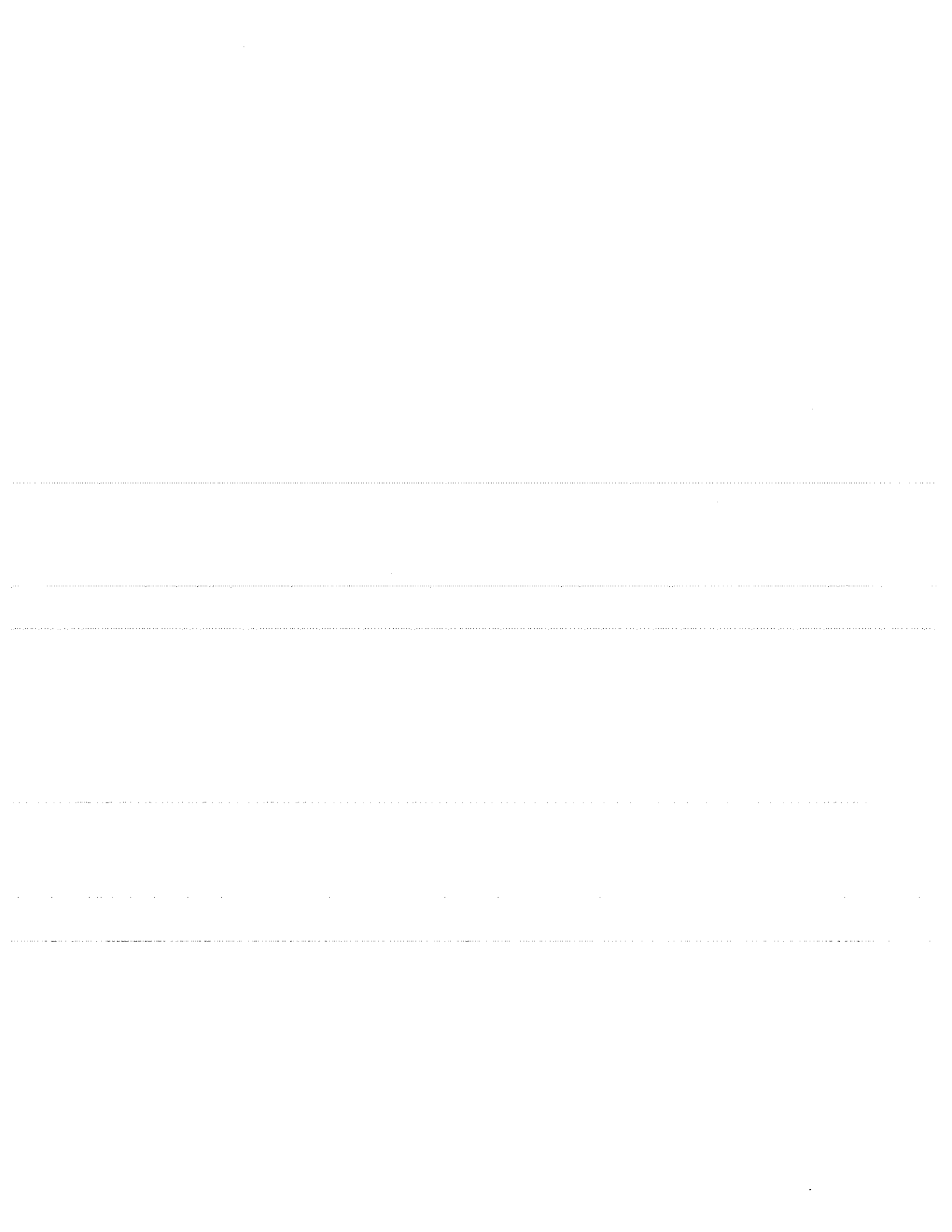
Be Ready to Provide this Information

- Your name and phone number from where you are calling
- Exact address and location of the spill
- What spilled, and how much? (pounds, gallons, number of containers)
- Where did the spill go, what did it contaminate (pavement, soil, drains, water bodies, public street/sidewalk)?
- How concentrated is the spilled material?
- Who spilled the product and is anyone cleaning up the spill?
- Type and amount of petroleum stored on site, **if any.**
- Facility and container characteristics. (tanks, pipes, valves)

OVER

ATTACHMENT F

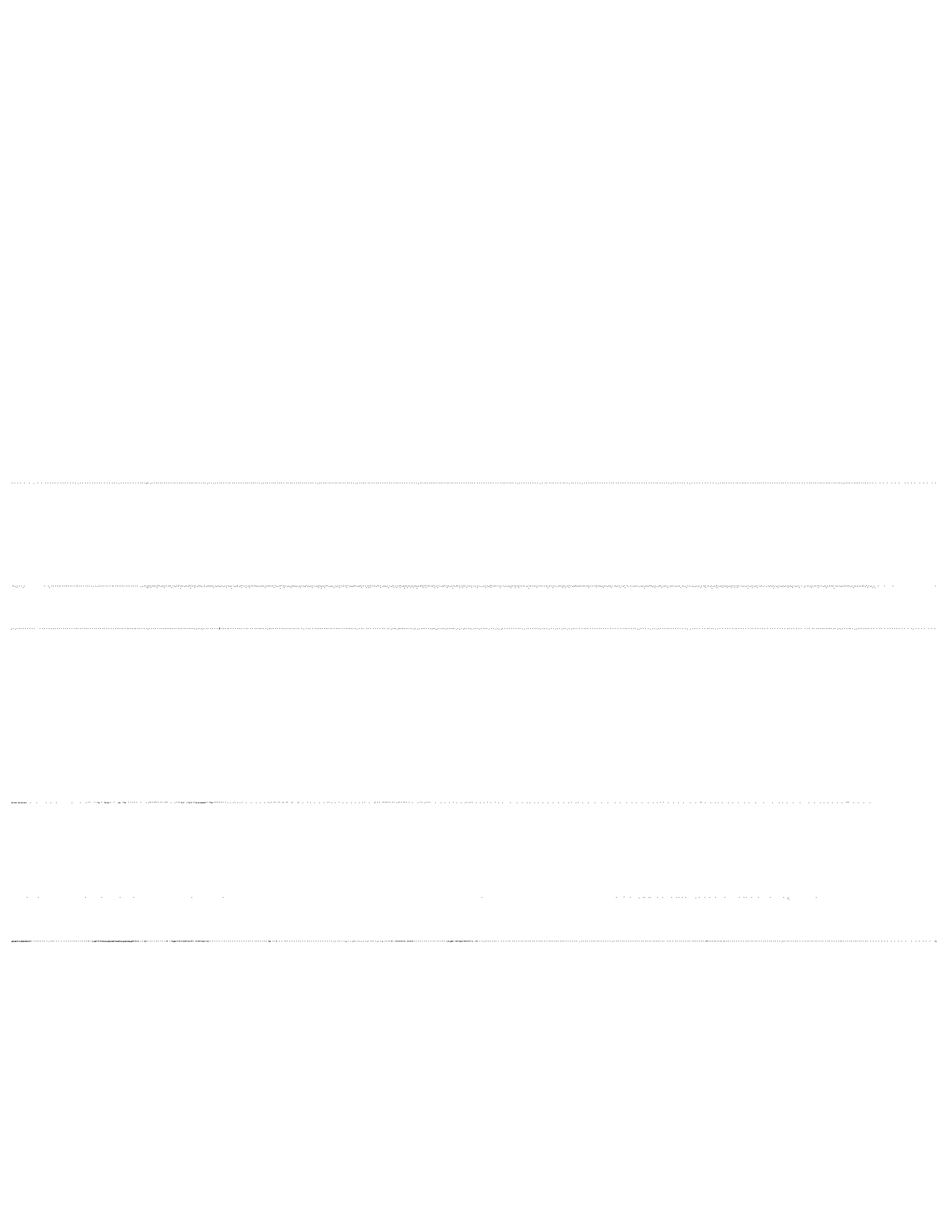
Benchmark Sample Results Table



Home Fire Prest Logs Ltd.
Benchmark Sample Results Table
(As of December 15, 2017)

Date	Outfall						
	Turbidity	pH (s.u.)	Oil Sheen (visual)	Cu (ug/l)	Zn (ug/l)	COD (mg/l)	TSS (mg/l)
06/30/12				2.3	65.4	6.6	30.0
11/12/12	6.3 mg/l			2.4	35	3.7	<15
03/19/14	0.5 mg/l			<2.0	355	<1.0	<10
12/23/14	1.5 mg/l			<2.0	754	2.1	<10
1 st Qtr. 2015							
2 nd Qtr. 2015	No Discharge						
3 rd Qtr. 2015	No Discharge						
4 th Qtr. 2015	14 NTU	6.9	No	6.6	164/121	<10	7.9
1 st Qtr. 2016	6.0 NTU	5.7	No	<2.0	58	<10	2.9
2 nd Qtr. 2016	No Discharge						
3 rd Qtr. 2016	No Discharge						
4 th Qtr. 2016	16 NTU	5.6	No	<2	60	14	E
1 st Qtr. 2017	5.8 NTU	6.0	No	3.1	62	<10	20
2 nd Qtr. 2017	No Discharge						
3 rd Qtr. 2017	No Discharge						
4 th Qtr. 2017							
Benchmark Values	25 NTU	5.0–9.0 s.u.	Yes/No	14 ug/l	117 ug/l	120 mg/l	100 mg/l

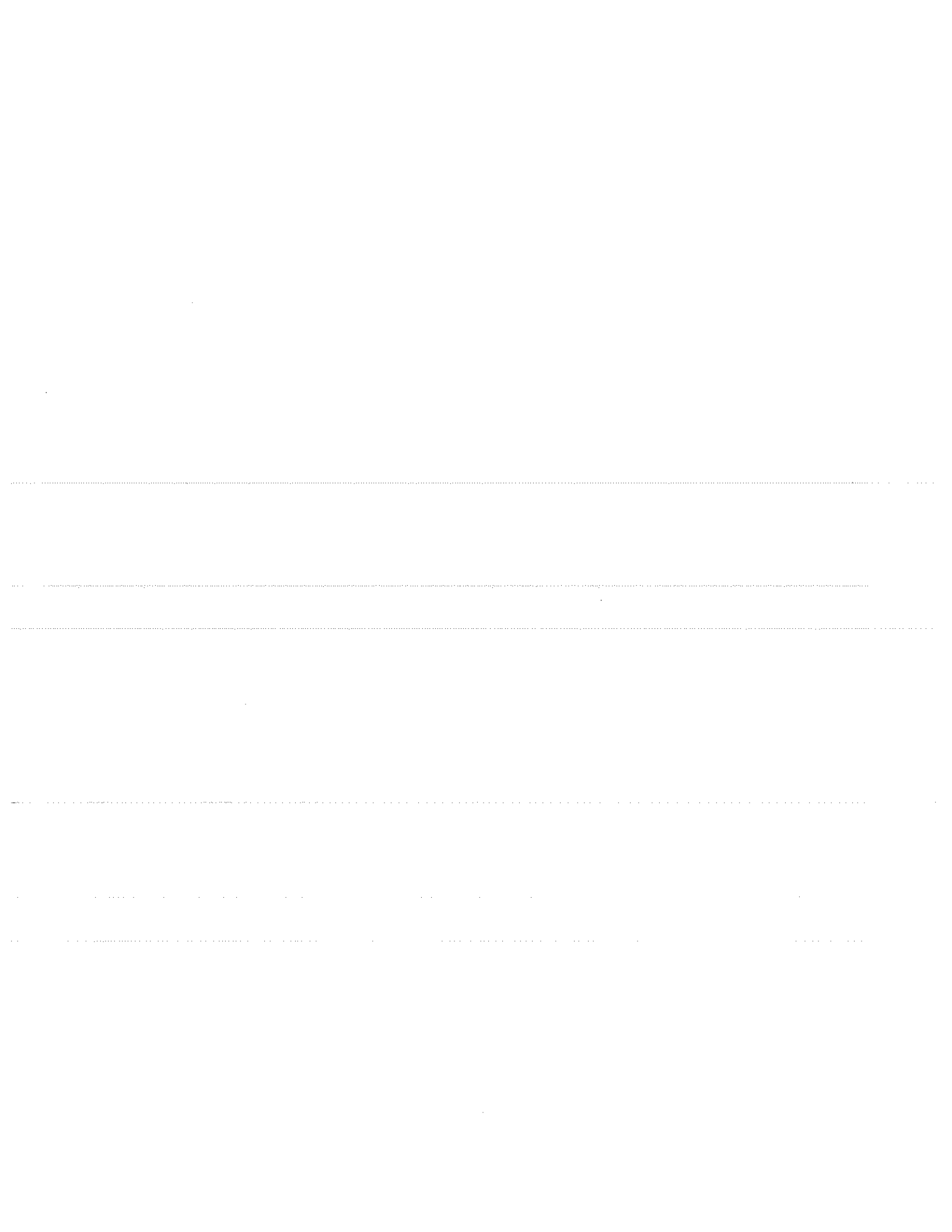
- E = Not Enough Sample
- Yellow shaded values indicate benchmark exceedances or other concerns.
- Roof runoff treatment system was installed in January 2016.



ATTACHMENT G

4th Quarter 2015 Sample Documentation

Homefire Prest Logs Ltd.



Washington Department of Ecology Submission Cover Letter

**WQWebDMR - Permit# WAR125508 - DMR Submission Id: 1529228 -
2/10/2016 10:56:15 AM**

Report Received Dated:

2/10/2016 10:56:16 AM

Company Name	Signer Name	System Name
Home Fire Prest Logs	Virginia Hermanson	WQWebPortal

Attachments:

Document Name of Description	Document File Name
Submitted Copy of Record for Home Fire Prest Logs	Copy of Record HomeFirePrestLogs Wednesday February 10 2016

Attestation Agreed to at Signing:

I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

For Ecology Use Only ---

Dev



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2zWpGG2bO6SHOPMONovuNWSA=



Permit Number: WAR125508

Permittee: Homefire Prest Logs

Facility County: Whatcom

Receiving Waterbody: California Creek

Monitoring Period: 10/01/2015 - 12/31/2015

Outfall: 002 - 002

Version: 1

Week	Monitoring Point	Turbidity (NTU) Measured NTU Quarterly Grab	pH Standard Units Quarterly Grab	Oil & Grease Yes/No Quarterly Visual Observation	Copper Total Micrograms/L (ug/L) Quarterly Grab	Zinc Total Micrograms/L (ug/L) Quarterly Grab	Total COO Total Milligrams/L (mg/L) Quarterly Grab	Solids (Residue) Total suspended (TSS) Milligrams/L (mg/L) Quarterly Grab
		002	002	002	002	002	002	002
	Limit Set	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Timber - 2015 Permit	ISGP Timber - 2015 Permit
9-W	11/25/15	14	6.9	no	6.6	121*	<10	7.9
Minimum			6.9 BM: >= 5.0 (RO)					
Average		14 BM: <= 25			6.6 BM: <= 14	121 BM: <= 117	<10 BM: <= 120	7.9 BM: <= 100
Maximum			6.9 BM: <= 9.0 (RO)					

Reporting Codes Used: B - Below Detection Limit/No Detection

Overall DMR Notes/Comment

Evasive action is underway for Zinc. Grattix Filters have been installed at 8 locations off the metal roof on the eavestrough. Rushes and sedges have been established. Those installations should solve our zinc content.

Outfall: 002 - 002

Monitoring Point	Parameter	Sample Date/ Statistical Base	Value	Notes/Comment
002	Zinc Total Micrograms/L (ug/L)	11/25/2015	121	Evasive action has been taken for high zinc. Eight Grattix filters have been installed at eight points off the eavestrough off the metal roof. The Grattix Filters are established with rushes and sedges. This action should lower our zinc to acceptable levels.

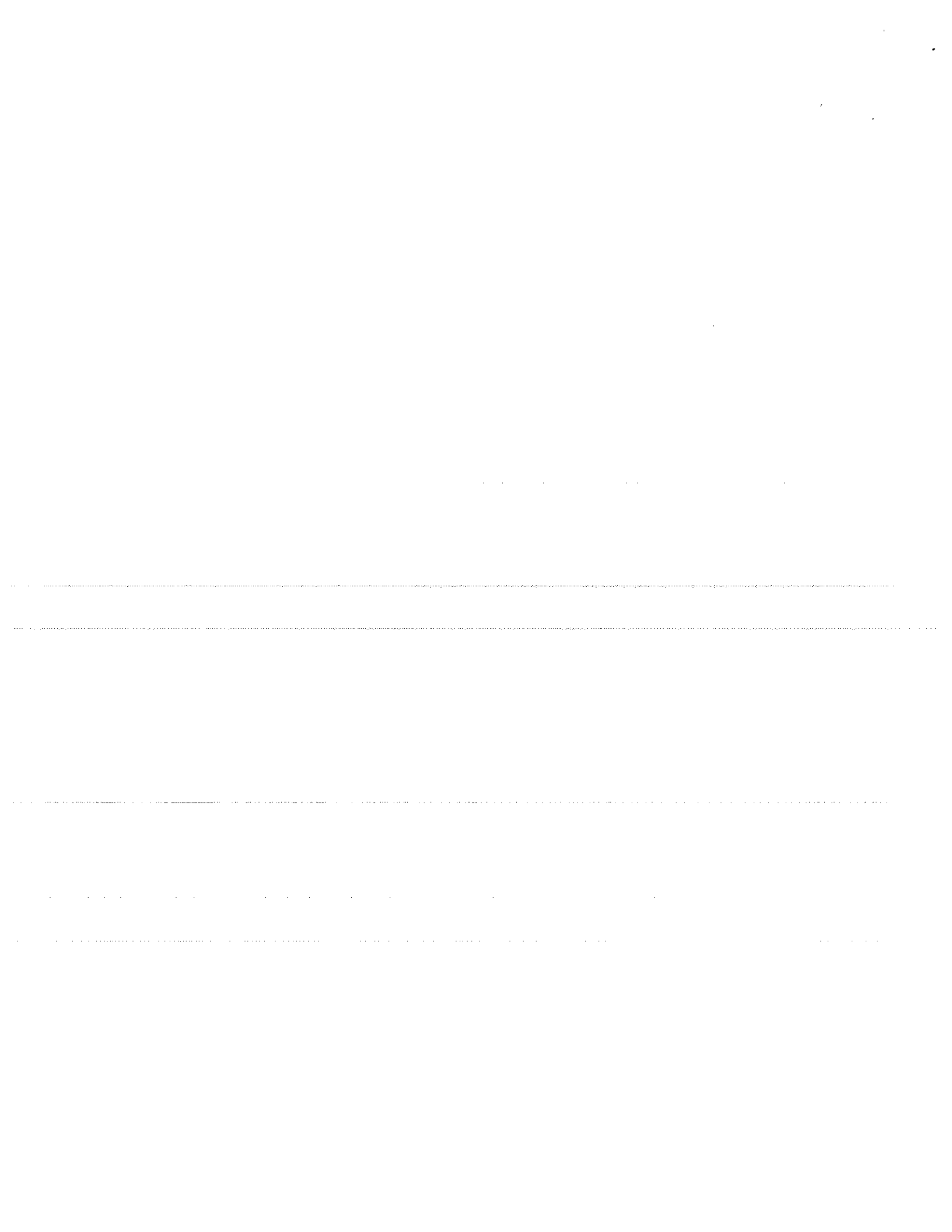
I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Virginia Hermanson

Signature

2/10/2016 10:56:14 AM

Date



Washington Department of Ecology Submission Cover Letter

**WQWebDMR - Permit# WAR125508 - DMR Submission Id: 1529228 -
2/10/2016 10:56:15 AM**

Report Received Dated:

2/10/2016 10:56:16 AM

Company Name	Signer Name	System Name
Home Fire Prest Logs	Virginia Hermanson	WQWebPortal

Attachments:

Document Name of Description	Document File Name
Submitted Copy of Record for Home Fire Prest Logs	Copy of Record HomeFirePrestLogs Wednesday February 10 2016

Attestation Agreed to at Signing:

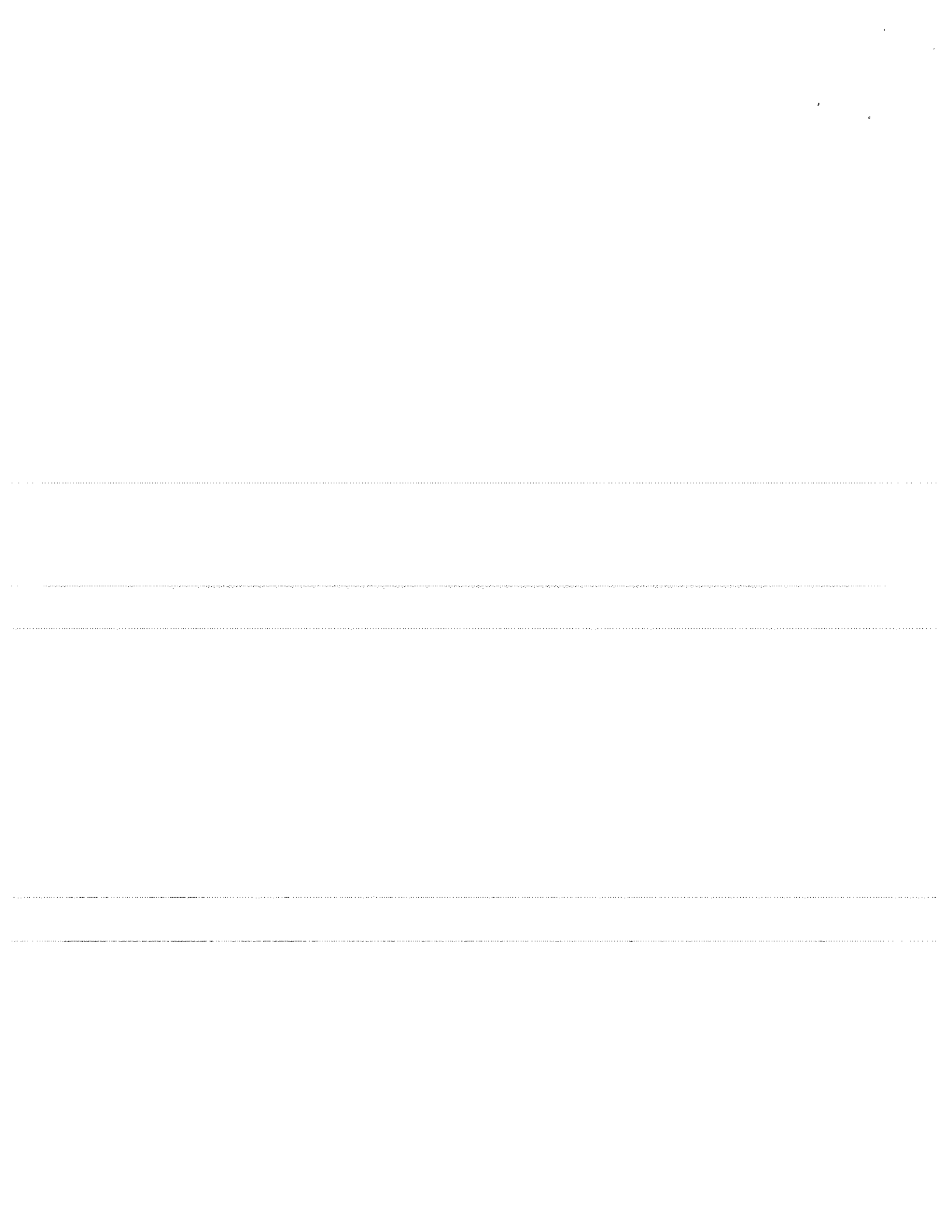
I certify I personally signed and submitted to the Department of Ecology an Electronic Signature Agreement. I understand that use of my electronic signature account/password to submit this information is equal to my written signature. I have read and followed all the rules of use in my Electronic Signature Agreement. I believe no one but me has had access to my password and other account information.

I further certify: I had the opportunity to review the content or meaning of the submittal before signing it; and to the best of my knowledge and belief, the information submitted is true, accurate, and complete. I intend to submit this information as part of the implementation, oversight, and enforcement of a federal environmental program. I am aware there are significant penalties for submitting false information, including possible fines and imprisonment.

**For Ecology Use Only ---
Dev**



yqBCIXkRbjPxNwQqGUGdUEKFRkVzuPq/0ccmJ/coslJOOpJ0UpINCT2o7M8k3u3nfukrX0fDyeZzl2SPmw
ZzWpGG2bO6SHOPMONovuNWsA=



Avocet Environmental Testing
1500 North State Street, Suite 200
Bellingham, WA 98225-4551
(360) 734-9033



Client
Contact Name Home Fire Prest-Logs
 Virginia

Chain of Custody 8866

Date Sampled 10/12/15
Date Received 10/12/15
Date Reported 10/27/15

Matrix Stormwater

Sample Identification	Log Number	Test Performed	Method	Sample Result	Units	PQL	MDL	Date Analyzed	Analyst
Home Fire	05755834	pH	sm4500-H	6.9* @ 17.6°C	S.U.	--	--	10/12/15	ML
		TSS	sm2540D	7.9	mg/L	1.2	--	10/13/15	GW
		COD	EPA410.4	<10	mg/L	10	2.0	10/14/15	GW
		Turbidity	EPA180.1	14	NTU	0.1	--	10/13/15	GW
		Total Copper	sm3113B	6.6	µg/L	2.0	0.4	10/22/15	ML
		CAS#:7440-50-8							
		Total Zinc	sm3111B	164	µg/L	15	3.0	10/21/15	ML
		CAS#:7440-66-6							

QUALITY CONTROL DATA

Test Performed	QC Known Recovery	Recovery Limits	Duplicate Difference
TSS	98%	93-99%	<1%
COD	95%	90-110%	<1%
Turbidity	95%	90-110%	N/A
Total Copper	95%	90-110%	N/A
Total Zinc	100%	90-110%	4%

*: Sample was not received within the recommended holding time of 15 minutes.

<: Less Than

COD: Chemical Oxygen Demand

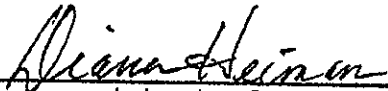
MDL: Method Detection Limit

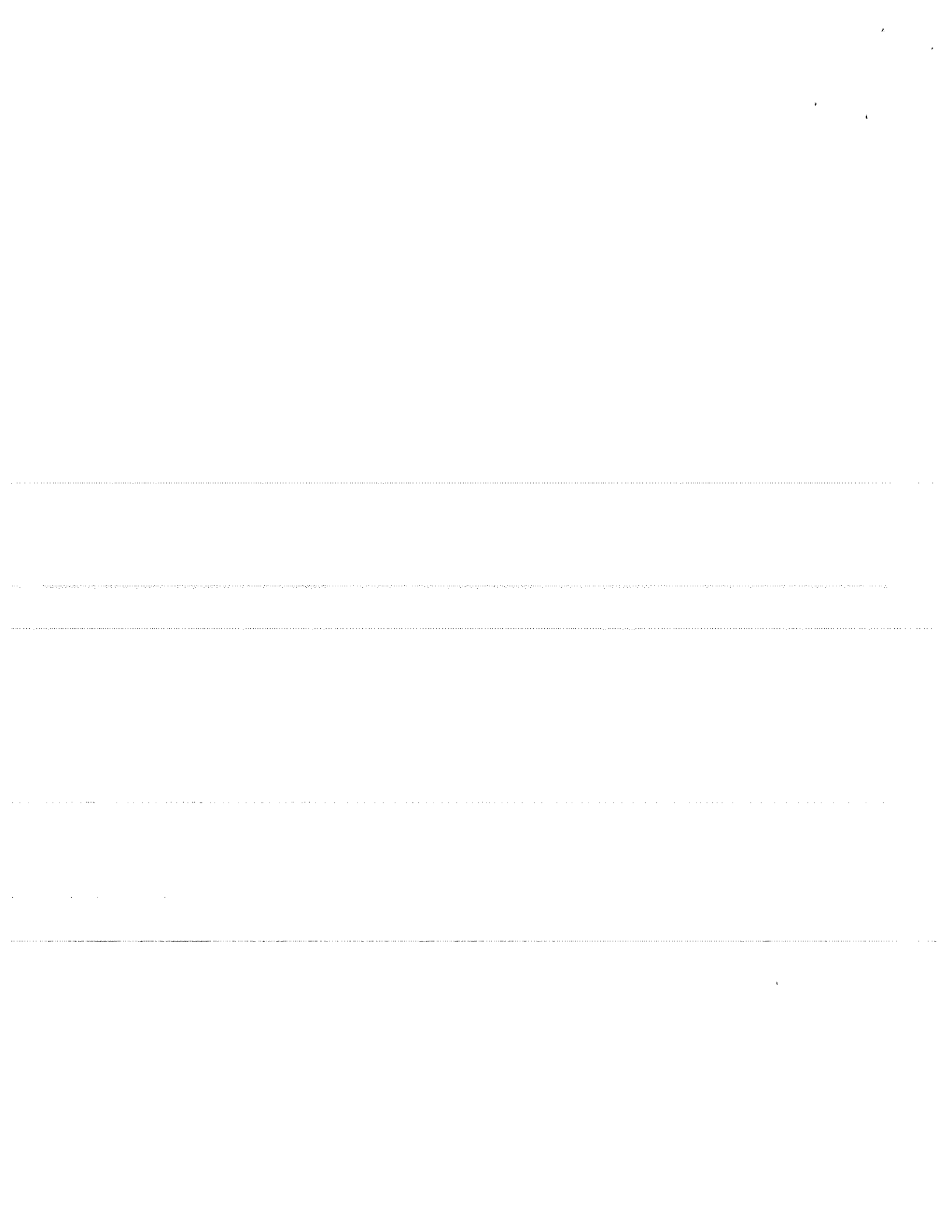
N/A: Not Applicable

NTU: Nephelometric Turbidity Units

PQL: Practical Quantitation Limit

TSS: Total Suspended Solids


Laboratory Supervisor



CHAIN OF CUSTODY

1500 NORTH STATE STREET, SUITE 200
Bellingham, WA 98225
(360) 734-9033 FAX (360) 734-0467
TOLL FREE 800/227-9427

ENVIRONMENTAL TESTING

6292

BILLING INFORMATION IF DIFFERENT THAN CLIENT:

CLIENT	NAME	INAME
1	1	1
2	2	2
3	3	3
4	4	4
5	5	5
6	6	6
7	7	7
8	8	8
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99	99	99
100	100	100

ADDRESS _____ _____	PHONE _____ _____
ADDRESS _____ _____	

CITY, STATE, ZIP _____ FAX _____ CITY, STATE, ZIP _____

COLLECTED BY _____

PROJECT NAME: _____ P.O.# _____ PHONE () _____

P.O.#

SAMPLE IDENTIFICATION	MATRIX	NO. OF CONTAINERS	SAMPLE DATE/TIME PRESERVED	ANALYSIS / METHOD REQUESTED	LOG NO. (LAB USE ONLY)
-----------------------	--------	-------------------	----------------------------	-----------------------------	------------------------

Home fire

113

PLASTIC
OTHER

TIME	11:11
DATE	300

Other:

Zinc

10/1/20	
---------	--

Samples were not @ 2-6°C upon receipt

Cooling process has begun? ☒ Yes ☐ No

REMARKS:

RECEIVED VIA: ☒ CLIENT ☐ AET ☐ COURIER ☐ OTHER: _____

ON ICE? ☒ YES ☐ NO

TEMP 13.4 °C

CUSTODY SEAL ☐ YES ☐ NO ☒ N/A

TEMP 13.4 °C

CUSTODY SEAL

☐ YES ☐ NO ☒ N/A

DATE _____

TIME

RELEASING
SIGNATURE 1.

RELEASING
SIGNATURE 2.

RECEIVING SIGNATURE 1.		11/17/15	1308
RECEIVING SIGNATURE 2.		11/17/15	1308

11/17/15 1300

DATE _____

TIME

RELEASING SIGNATURE 2.

RECEIVING
SIGNATURE 2. 11/17/15 503

11/17/15 Doc

Avocet Environmental Testing
1500 North State Street, Suite 200
Bellingham, WA 98225-4551
(360) 734-9033



Client
Contact Name **Home Fire Prest-Logs**
 Virginia

Chain of Custody 8926

Date Sampled 11/17/15
Date Received 11/17/15
Date Reported 11/25/15

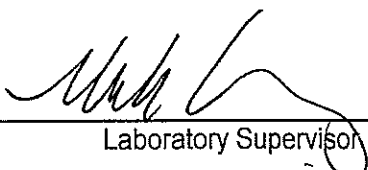
Matrix Stormwater

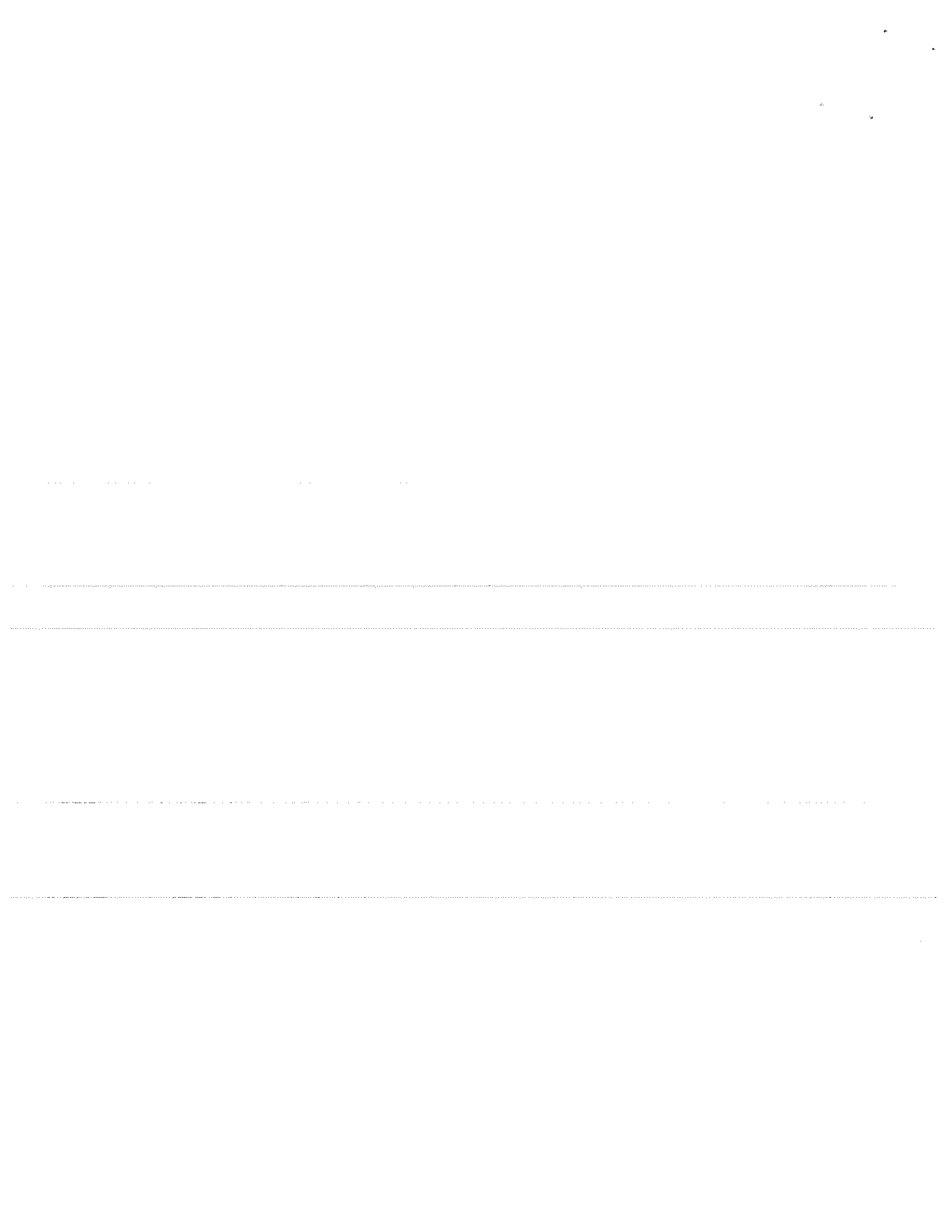
Sample Identification	Log Number	Test Performed	Method	Sample Result	Units	PQL	MDL	Date Analyzed	Analyst
Home Fire	05757139	Total Zinc CAS#:7440-66-6	sm3111B	121	µg/L	15	3.0	11/24/15	ML

QUALITY CONTROL DATA

Test Performed	QC Known Recovery	Recovery Limits	Duplicate Difference
Total Zinc	102%	90-110%	3%

MDL: Method Detection Limit
PQL: Practical Quantitation Limit


Laboratory Supervisor



Avocet Environmental Testing
1500 North State Street, Suite 200
Bellingham, WA 98225-4551
(360) 734-9033



HOMEFIRE PREST LOGS
6925 SALASHAN PKWY
FERNDAL, WA 98248
CONTACT:

INVOICE NO.: 1504208-IN
DATE: 11/18/15
CLIENT CODE: HOMEFIR
PAGE NO.: 1

FOR PROFESSIONAL SERVICES RENDERED:

UNITS AMOUNT

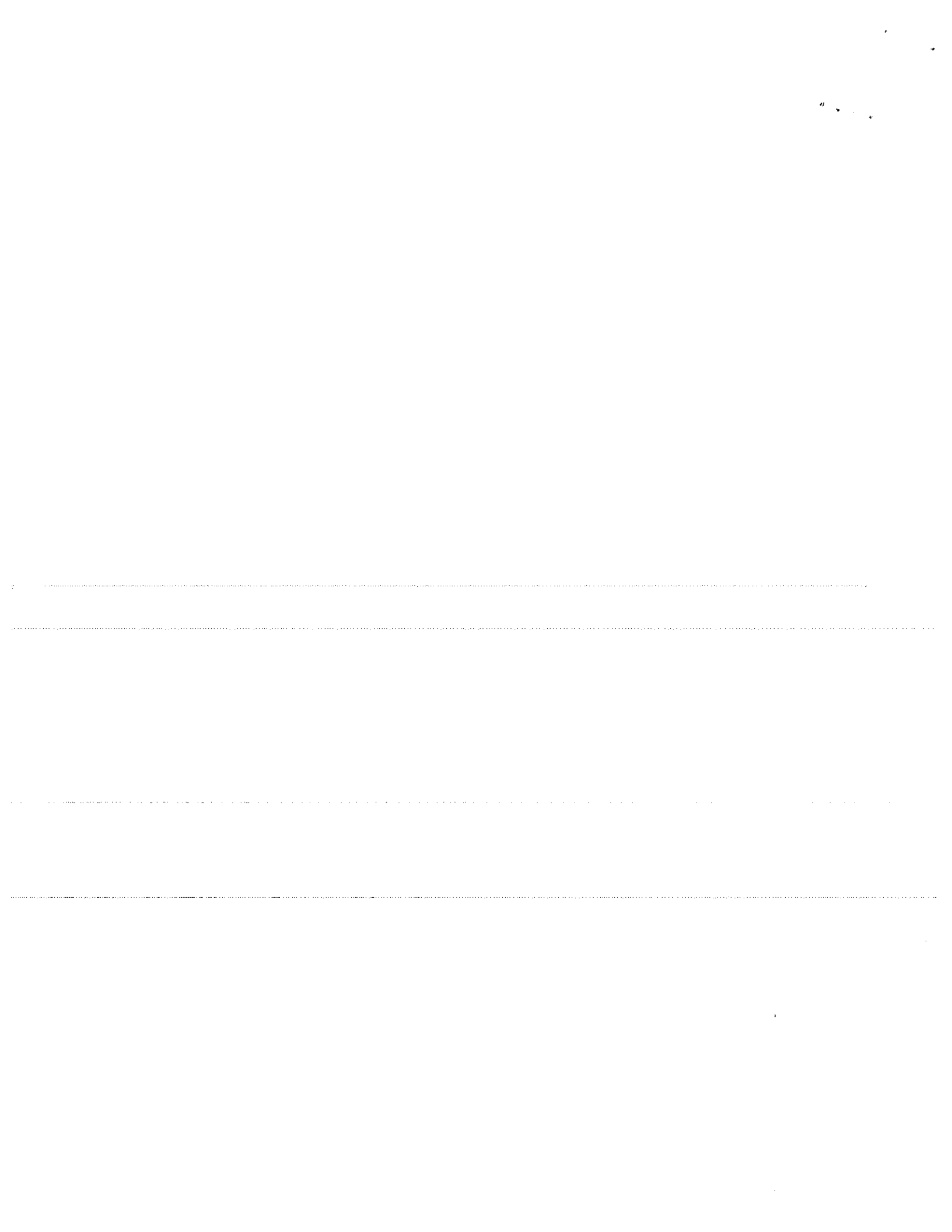
11/17/15
GRAPHITE/FLAME ATOMIC ABSORPTION
8926-57139/Zn

1.00 23.00

TOTAL FEES: 23.00

AMOUNT DUE: 23.00

PAYMENT DUE UPON RECEIPT





Discharge Monitoring Reports WQWebDMR

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DMR Receipt Confirmation

You will receive an email for each DMR that was successfully signed:

Permit Number: WAR125508

Permit Type: Industrial SW GP

Facility Name: Homefire Prest Logs

Monitoring Period: 10/01/2015 - 12/31/2015

Submitted Date: 02/10/2016

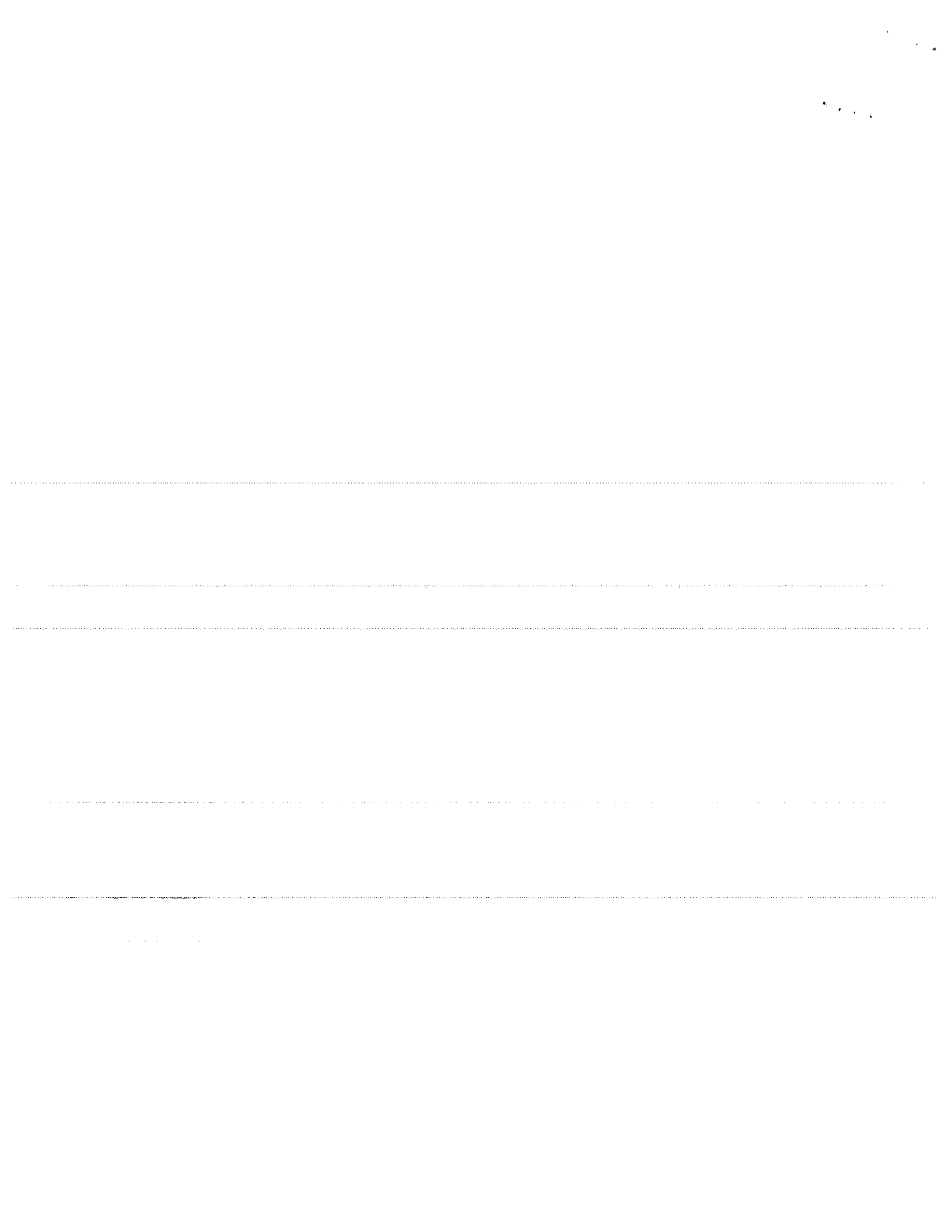
Submitted By: Homefirelogs

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[Ecology Home](#) | [WQWebPortal Home](#) | [WQWebDMR Home](#) | [Help](#) | [FAQs](#) | [Release Notes](#) | [Contact Us](#)

[Discharge Monitoring Reports \(WQWebDMR\) Version 3.5.1](#) | [Data Disclaimer](#) | [Privacy Policy](#)

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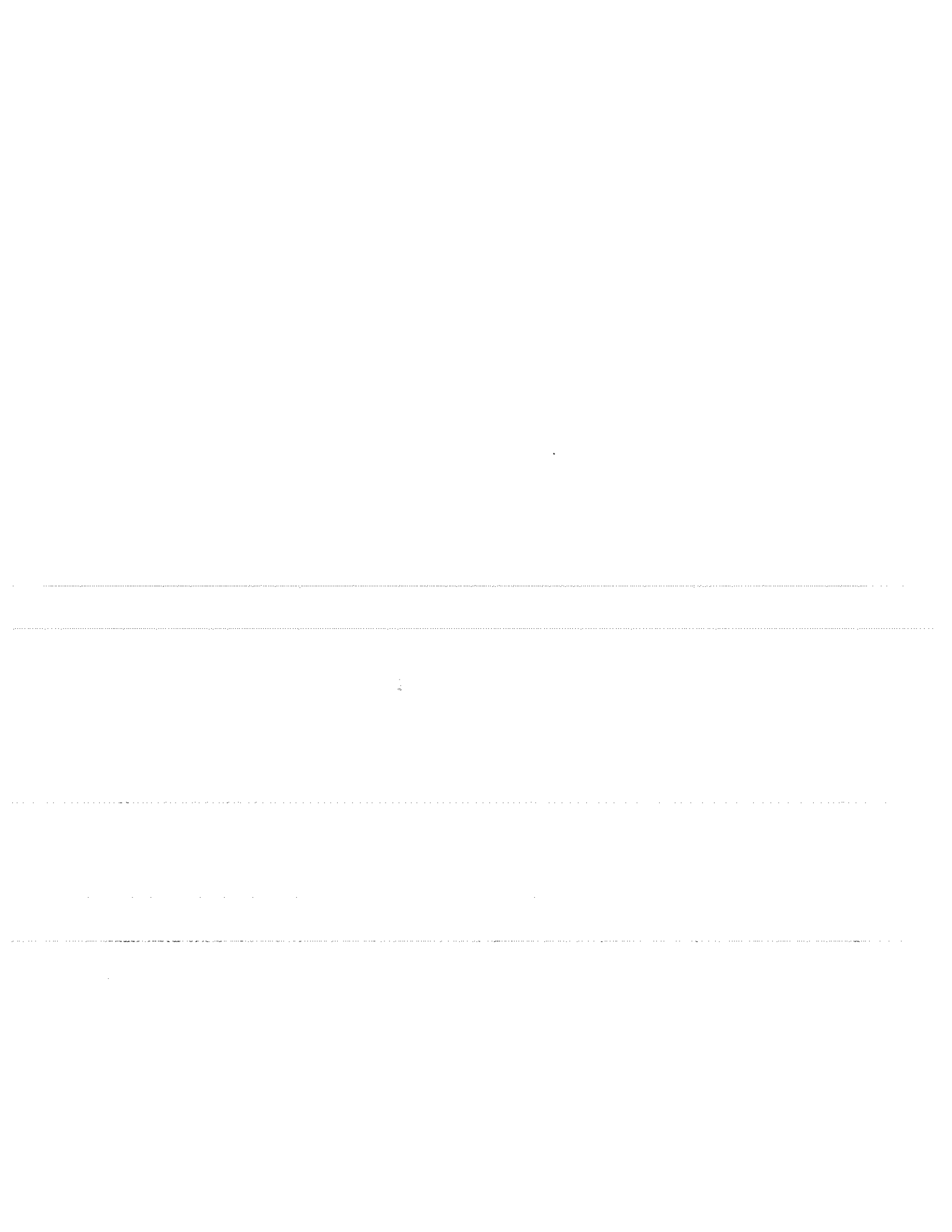


ATTACHMENT H

Record of Communication

Between Ms. Virginia Hermanson and Joe Roberto

Homefire Prest Logs Ltd.



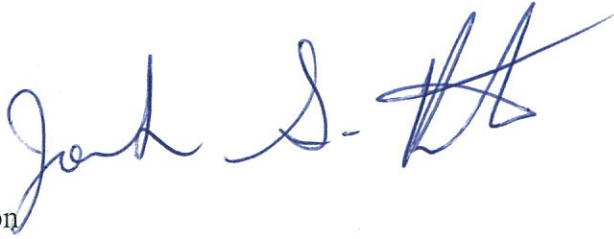
Record of Communication

Date: February 5, 2018

Time: 1:30 PM

From: Joe Roberto

To: Virginia Hermanson



Purpose: The purpose of this phone communication was to obtain additional information from Ms. Hermanson regarding the Homefire Prest Log facility in Ferndale, Washington.

Discussion: During the discussion with Ms. Hermanson I asked the following information:

Question At the time of the 2017 inspection, you were not able to produce the monthly visual inspection report for November 2017. Describe the situation with this report.

Answer Ms. Hermanson indicated that she did conduct this inspection. She also said that she prepared the report for this inspection. Ms. Hermanson speculated that the report was just misplaced and that she would continue to look for it.

Question Was oil sheen monitored during the following quarters:

- 4th quarter 2015,
- 1st and 4th quarter 2016, and
- 1st quarter 2017?

Answer Ms. Hermanson indicated that whenever she collects a sample she looks for oil sheen. She specifically indicated that she has monitored oil sheen for all the quarters mentioned above.

Question Have all pH samples collected between the 4th quarter of 2015 and the date of the inspection (on December 15, 2017) been analyzed by an outside lab.

Answer Yes.

Question Has the storm drain on the west side of the facility been plugged?

Answer The drain is currently covered, but not yet sealed. It will be sealed within a week.

